

KRAMER LEVIN NAFTALIS & FRANKEL LLP

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*Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re:** : **Chapter 11**  
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**PURDUE PHARMA L.P., et al.,** : **Case No. 19-23649 (RDD)**  
:  
**Debtors.<sup>1</sup>** :  
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**ELEVENTH INTERIM APPLICATION OF KRAMER LEVIN NAFTALIS & FRANKEL  
LLP, AS CO-COUNSEL TO THE AD HOC COMMITTEE OF GOVERNMENTAL  
AND OTHER CONTINGENT LITIGATION CLAIMANTS, FOR ALLOWANCE OF  
COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND FOR  
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED  
FOR THE PERIOD FROM JANUARY 1, 2023 THROUGH APRIL 30, 2023**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<b>Name of Applicant</b>	Kramer Levin Naftalis & Frankel LLP
<b>Authorized to Provide Professional Services to:</b>	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
<b>Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:</b>	December 2, 2019
<b>Interim Fee Period:</b>	January 1, 2023 through and including April 30, 2023
<b>Fees Requested for this Interim Fee Period:</b>	\$516,880.00
<b>Expenses Requested for this Interim Fee Period:</b>	\$14,158.90
<b>Total Amount Requested for this Interim Fee Period:</b>	\$531,038.90
<b>Less Amount Paid to Date for this Interim Fee Period:</b>	\$0.00
<b>Net Amount to be Paid for this Interim Fee Period (100% for January, February, March and April):</b>	\$516,880.00
<b>Blended Rate in this Application for All Attorneys:</b>	\$1,389.60
<b>Blended Rate in this Application for All Timekeepers:</b>	\$1,330.00
<b>Number of Professionals Included in this Application:</b>	22
<b>Number of Professionals Billing Fewer than 15 Hours to the Case During this Period:</b>	15
<b>If applicable, number of professionals in this application not included in staffing plans:</b>	N/A
<b>If applicable, difference between fees budgeted and compensation sought for this period:</b>	Fees incurred were less than budgeted fees for this period.
<b>Any rate increases during the Eleventh Interim Fee Period?</b>	See Statement Pursuant to Appendix B of the Guidelines.
<b>This is a(n):</b>	__ monthly <input checked="" type="checkbox"/> interim application      __ final application

**SUMMARY OF FEE STATEMENTS SUBJECT TO INTERIM PERIOD**

<i>Application</i>	<i>Total Compensation and Expenses Incurred for Period Covered</i>			<i>Total Amount Requested in Fee Statements</i>		<i>Total Unpaid</i>
<b>Date Filed/Docket No.</b>	<b>Period Covered</b>	<b>Total Fees</b>	<b>Expenses</b>	<b>Fees (80%)</b>	<b>Expenses (100%)</b>	<b>Fees and Expenses</b>
3/13/2023 [Dkt. No. 5494]	1/1/2023-1/31/2023	\$46,013.00	\$6,269.26	\$36,810.40	\$6,269.26	\$52,282.26
4/5/2023 [Dkt. No. 5536]	2/1/2023-2/28/2023	\$111,217.50	\$2,462.48	\$88,974.00	\$2,462.48	\$113,679.98
5/22/2023 [Dkt. No. 5625]	3/1/2023-3/31/2023	\$113,742.00	\$2,312.73	\$90,993.60	\$2,312.73	\$116,054.73
5/25/2023 [Dkt. No. 5635]	4/1/2023-4/30/2023	\$245,907.50	\$3,114.43	\$196,726.00	\$3,114.43	\$249,021.93
<b>Totals:</b>		<b>\$516,880.00</b>	<b>\$14,158.90</b>	<b>\$413,504.00</b>	<b>\$14,158.90</b>	<b>\$531,038.90</b>

**SUMMARY OF PRIOR INTERIM FEE APPLICATIONS**

<b>Date Filed/Docket No.</b>	<b>Period Covered</b>	<b>Fees Requested</b>	<b>Expenses Requested</b>	<b>Fees Paid</b>	<b>Expenses Paid</b>	<b>Order</b>
3/16/2020 [Dkt. No. 957]	9/16/2019-1/31/2020 First Interim Period <sup>2</sup>	\$2,635,092.25	\$47,449.28	\$2,616,629.54	\$47,449.28	Dkt. Nos. 1159 & 1306
7/20/2020 [Dkt. No. 1459]	2/1/2020-5/31/2020 Second Interim Period <sup>3</sup>	\$1,568,914.50	\$92,717.65	\$1,556,969.50	\$92,697.65	Dkt. No. 1649
11/17/2020 [Dkt. No. 1996]	6/1/2020-9/30/2020 Third Interim Period <sup>4</sup>	\$1,698,836.50	\$69,971.34	\$1,668,836.50	\$69,971.34	Dkt. Nos. 2144 & 2353
3/17/2021 [Dkt. No. 2529]	10/1/2020-1/31/2021 Fourth Interim Period and	\$3,818,924.65	\$60,444.15	\$3,818,924.50	\$60,444.15	Dkt. No. 2698

<sup>2</sup> At the request of the fee examiner, Applicant agreed to a reduction of \$18,462.71 in fees and expenses.

<sup>3</sup> At the request of the fee examiner, Applicant agreed to a reduction of \$11,965.00 in fees and expenses.

<sup>4</sup> At the request of the fee examiner, Applicant agreed to a reduction of \$30,000.00 in fees and expenses.

	Allocation Fees <sup>5</sup>					
7/15/2021 [Dkt. No. 3234]	2/1/2020- 5/31/2021 Fifth Interim Period <sup>6</sup>	\$3,922,853.00	\$14,335.04	\$3,891,992.00	\$14,335.04	Dkt. No. 3603
11/15/2021 [Dkt. No. 4142]	2/1/2020- 5/31/2021 Sixth Interim Period <sup>7</sup>	\$5,651,625.50	\$61,624.84	\$5,626,625.50	\$61,624.84	Dkt. No. 4237
3/17/2022 [Dkt No. 4562]	10/1/2021- 1/31/2022 Seventh Interim Period <sup>8</sup>	\$3,832,741.50	\$67,611.02	\$3,805,708.50	\$67,562.01	Dkt. No. 4716
5/16/2022 [Dkt No. 4841]	2/1/2022- 4/30/2022 Eighth Interim Period	\$1,578,687.50	\$22,132.43	\$1,578,687.50	\$22,132.43	Dkt. No. 4927
10/17/2022 [Dkt No. 5180]	5/1/2022- 8/31/2022 Ninth Interim Period	\$599,076.00	\$263,157.10	\$599,076.00	\$263,157.10	Dkt. No. 5256
2/14/2023 [Dkt. No. 5434]	1/1/2023- 4/30/2023 Tenth Interim Period <sup>9</sup>	\$217,161.50	\$7,400.36	\$211,293.50	\$7,400.36	Dkt. No. 5529

<sup>5</sup> At the request of the fee examiner, Applicant agreed to a reduction of \$30,000 in fees. The Fourth Interim Fee Application also requested payment of \$1,585,682.00 in separate fees incurred from October 11, 2019 through and including September 30, 2020 relating to allocation of value among the Debtors' creditors ("Allocation Fees"). Allocation Fees were separately approved by the Court on December 22, 2020 with the entry of the *Second Supplemental Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals* [Docket No. 2190].

<sup>6</sup> At the request of the fee examiner, Applicant agreed to a reduction of \$30,861.00 in fees.

<sup>7</sup> At the request of the fee examiner, Applicant agreed to a reduction of \$25,000.00 in fees.

<sup>8</sup> At the request of the fee examiner, Applicant agreed to a reduction of \$27,082.01 in fees and expenses.

<sup>9</sup> At the request of the fee examiner, Applicant agreed to a reduction of \$5,868.00 in fees.

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**In re:** : **Chapter 11**  
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**Debtors.<sup>1</sup>** :  
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**ELEVENTH INTERIM APPLICATION OF KRAMER LEVIN NAFTALIS & FRANKEL  
LLP, AS CO-COUNSEL TO THE AD HOC COMMITTEE, FOR ALLOWANCE  
OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND FOR  
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED  
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TO: THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE:

Kramer Levin Naftalis & Frankel LLP (the “Applicant” or “Kramer Levin”), co-counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “Ad Hoc Committee”) of the above-captioned debtors and debtors-in-possession (the “Debtors”) in these Chapter 11 Cases, hereby submits its Eleventh Interim Application (the “Application”) for Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred for the Period from January 1, 2023 through April 30, 2023 (the “Eleventh Interim Fee Period”), pursuant to title 11 of the United States Code (the “Bankruptcy Code”) Sections 330(a) and 331, the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) Rule 2016, and the Local Bankruptcy Rules for the Southern District of New York (the “Local Bankruptcy Rules”) Rule 2016-1, for the interim allowance of compensation for the professional services performed by Kramer Levin for and on behalf of the Ad Hoc Committee and reimbursement of its actual and necessary expenses for the Eleventh Interim Fee Period. In support of the Application, Kramer Levin respectfully represents as follows:

**JURISDICTION**

1. The United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334.
2. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

**PRELIMINARY STATEMENT**

3. During the Eleventh Interim Fee Period, Kramer Levin continued to actively represent the Ad Hoc Committee in all aspects of these Chapter 11 Cases. However, in light of

the appeals pending before the Second Circuit of the *Findings of Fact, Conclusions of Law, and Order Confirming the Twelfth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and its Affiliated Debtors* [Dkt. No.3787] (the “Confirmation Order”), Kramer Levin continued to minimize time expended during the Eleventh Interim Fee Period. The Ad Hoc Committee’s efforts were largely focused on developing a strategy and preparing next steps to address the pending Second Circuit ruling and its implication on the Debtors’ emergence and continuing to evaluate the Debtors’ business operations, including its sale of Avrio assets.

4. In addition, Kramer Levin worked diligently to ensure that the Ad Hoc Committee and its professionals were appropriately informed of all case updates through: (i) monitoring the filings, pleadings, and other developments in the Chapter 11 Cases to ensure the Ad Hoc Committee was up-to-date on the status of the case; (ii) hosting Ad Hoc Committee and working group calls and disseminating extensive and detailed e-mail reports and other correspondence with the Ad Hoc Committee members; and (iii) addressing the questions of Ad Hoc Committee members inquiring about the status and disposition of the case.

5. Accordingly, Kramer Levin respectfully submits that its services during the Eleventh Interim Fee Period warrant approval of its requested fees and expenses.

**SUMMARY OF PROFESSIONAL COMPENSATION  
AND REIMBURSEMENT OF EXPENSES REQUESTED**

6. This Application has been prepared in accordance with the Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases adopted by the Court on January 23, 2013 (the “Local Guidelines”), as amended, and the United States Trustee for the Southern District of New York (the “UST”) Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, adopted on January 30, 1996 (the “UST Guidelines”), the *Order Establishing Procedures for*

*Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 529] (the “**Interim Compensation Order**,” collectively with the Local Guidelines and UST Guidelines, the “**Guidelines**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* [Docket No. 553] (the “**Fee Assumption Order**”). Pursuant to the Local Guidelines, a certification of Kenneth H. Eckstein regarding compliance with the same is attached as **Exhibit A** hereto.

7. Kramer Levin seeks the interim allowance of fees for professional services rendered during the Eleventh Interim Fee Period in the aggregate amount of \$516,880.00 (the “**Eleventh Interim Fees**”) and reimbursement of expenses incurred in connection with the rendition of those services in the aggregate amount of \$14,158.90 (the “**Eleventh Interim Expenses**”). Kramer Levin’s attorneys and paraprofessionals expended a total of approximately 387.40 hours for which compensation is requested.

8. There is no agreement or understanding between Kramer Levin and any other person, other than members of Kramer Levin, for the sharing of compensation to be received for services rendered in these Chapter 11 Cases.

9. The fees charged by Kramer Levin in these Chapter 11 Cases are billed in accordance with its existing billing rates in effect during the Eleventh Interim Fee Period.

10. During the course of these Chapter 11 Cases, Kramer Levin exercised its billing discretion and, as discussed in more detail below, voluntarily wrote off certain expenses. Kramer Levin’s decision to apply these write-offs of expenses has resulted in savings to the estates during this Eleventh Interim Fee Period of \$1,374.34.

11. Kramer Levin’s rates for the services rendered by its professionals and paraprofessionals in these Chapter 11 Cases are the same rates that Kramer Levin charges for such

professional and paraprofessional services rendered in comparable non-bankruptcy matters. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy cases in a competitive national legal market.

12. Pursuant to the UST Guidelines, annexed hereto as **Exhibit B** is a schedule setting forth all professionals and paraprofessionals employed by Kramer Levin who have performed services in these Chapter 11 Cases during the Eleventh Interim Fee Period, the capacities in which each such individual is employed by Kramer Levin, the department in which each individual practices, the year in which the individual was licensed to practice law in the state of New York, the hourly billing rate charged by Kramer Levin for services performed by such individual, and the aggregate number of hours expended and fees billed.

13. Annexed hereto as **Exhibit C** is a schedule specifying the categories of expenses for which Kramer Levin is seeking reimbursement and the total amount for each such expense category. Annexed hereto as **Exhibit D** is Kramer Levin's detail of disbursements and expenses and a schedule specifying the categories of expenses for which Kramer Levin is seeking reimbursement and the total amount for each expense category for the Eleventh Interim Fee Period.

14. Pursuant to the UST Guidelines, annexed hereto as **Exhibit E** is a summary of Kramer Levin's time billed during the Eleventh Interim Fee Period, broken down by project categories as hereinafter described.

15. Kramer Levin maintains computerized records of the time spent by all of Kramer Levin's attorneys and paraprofessionals in connection with its representation of the Ad Hoc Committee. These records were used to prepare detailed time descriptions in accordance with the UST Guidelines and organized by project codes. These detailed time records, along with the detailed listings of the expenses incurred in connection with the services rendered, were submitted

to the Court (with notice given in accordance with the Interim Compensation Order and Fee Assumption Order) as part of the Monthly Fee Statements (defined below). Copies of the final detailed time records and expenses for the Eleventh Interim Fee Period are being provided herewith to the Court and the Notice Parties, and are attached hereto as **Exhibit F**.

16. Since the commencement of these Chapter 11 Cases, Kramer Levin has provided the Court with a Monthly Fee Statement for each month for which compensation was sought pursuant to the Interim Compensation Order established in these Chapter 11 Cases. During the Eleventh Interim Fee Period, Kramer Levin provided the appropriate Court with the following monthly fee statements:

- a. For January 1, 2023 through and including January 31, 2023, fees of \$46,013.00 and expenses of \$6,269.26 (the “**January Fee Statement**”);
- b. For February 1, 2023 through and including February 28, 2023, fees of \$111,217.50 and expenses of \$2,462.48 (the “**February Fee Statement**”);
- c. For March 1, 2023 through and including March 31, 2023, fees of \$113,742.00 and expenses of \$2,312.73 (the “**March Fee Statement**”; and
- d. For April 1, 2023 through and including April 30, 2023, fees of \$245,907.50 and expenses of \$3,114.43 (the “**April Fee Statement**,” collectively with the January Fee Statement, the February Fee Statement, and the March Fee Statement, the “**Monthly Fee Statements**”).

17. In total, Kramer Levin has submitted Monthly Fee Statements during the Eleventh Interim Fee Period for fees of \$516,880.00 and expenses of \$14,158.90. As of the date of this Application, no notice party has objected to the Monthly Fee Statements.

18. Prior to the service of each Monthly Fee Statement, Kramer Levin conducted an internal review of fees and expenses incurred during that month. As a result of such review, Kramer Levin wrote off a total of \$1,374.34 in expenses. The Monthly Fee Statements reflected the reduced amount after write-offs. Accordingly, Kramer Levin hereby seeks allowance of fees incurred for the Eleventh Interim Fee Period in the amount of \$516,880.00, and the reimbursement of actual and necessary expenses incurred for the Eleventh Interim Fee Period in the amount of \$14,158.90.

19. In accordance with the Interim Compensation Order, Kramer Levin sought payment of 80% of its fees and 100% of its expenses incurred, pursuant to each Fee Statement filed with the Court.

20. In total, therefore, pursuant to this Application, Kramer Levin respectfully requests that the Court enter an order awarding Kramer Levin, on an interim basis, fees in an aggregate amount of \$516,880.00 and the reimbursement of actual and necessary expenses Kramer Levin incurred during the Eleventh Interim Fee Period in the aggregate amount of \$14,158.90. Kramer Levin requests payment of 20% of its fees that have been held back for the Fee Statements.

21. To the extent that time or disbursement charges for services rendered or expenses incurred relate to the Eleventh Interim Fee Period, but were not processed prior to the preparation of this Application, Kramer Levin reserves the right to request compensation for such services and reimbursement of such expenses in a future application.

22. A budget and staffing plan for the Eleventh Interim Fee Period is attached hereto as **Exhibit G**, which includes a comparison to actual amounts.<sup>2</sup>

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<sup>2</sup> A non-itemized monthly budget was provided to the Debtors for the period covered by this Application. An itemized budget is included with this Application for convenience. The fees sought in this Application are not, in the aggregate, more than 10% higher as compared to the non-itemized budget.

23. Kramer Levin's rates in these Chapter 11 Cases are consistent with the rates charged by Kramer Levin to its non-bankruptcy clients. These rates are similar to the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy and bankruptcy cases in a competitive national legal market. Pursuant to the U.S. Trustee Guidelines, **Exhibit H** discloses the blended hourly rates for all non-bankruptcy timekeepers in the New York office of Kramer Levin and the blended hourly rates for timekeepers who billed to the Committee during the Eleventh Interim Fee Period.

24. Prior to filing this Application, Kramer Levin provided the Ad Hoc Committee with a copy of the Application.

### **BACKGROUND**

25. On September 15, 2019, the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to Bankruptcy Code Sections 1107 and 1108.

26. The Ad Hoc Committee consists of (i) ten States, (ii) the PEC, (iii) six political subdivisions of States, and (iv) one federally recognized American Indian tribe, as identified in the verified statement filed pursuant to Bankruptcy Rule 2019 at Docket Number 279.

27. The Ad Hoc Committee is represented in these bankruptcy cases by the following counsel: (i) Kramer Levin Naftalis & Frankel LLP, as lead bankruptcy counsel; (ii) Brown Rudnick LLP, as coordinating counsel for the non-state members of the Ad Hoc Committee, including the PEC; (iii) Otterbourg P.C., as coordinating counsel for the state members of the Ad Hoc Committee; and (iv) Gilbert LLP, as mass tort, deal and insurance counsel. In addition, the Ad Hoc Committee has retained financial professionals to assist in, among other things, conducting diligence relating to the Settlement Term Sheet, and evaluating and structuring the complex sale and M&A transactions for the Sackler assets.

28. On October 29, 2019, the Debtors filed the *Motion to Assume the Prepetition Reimbursement Agreement with the Ad Hoc Committee, and to Pay the Fees and Expenses of the Ad Hoc Committee's Professionals* [Docket No. 394] (the “Fee Assumption Motion”).

29. On December 2, 2019, the Court granted the Fee Assumption Motion by entering the Fee Assumption Order.

### **SUMMARY OF LEGAL SERVICES RENDERED**

30. During the Eleventh Interim Fee Period, the Ad Hoc Committee worked with other case constituencies primarily to strategize and address issues currently on appeal before the Second Circuit and evaluate the Debtors’ business operations. The following summary is not a detailed description of the work performed, as the day-to-day services and the time expended in performing such services are fully set forth in Exhibit F. Rather, the following summary highlights certain areas in which services were rendered to the Ad Hoc Committee and identifies some of the issues to which Kramer Levin devoted significant time and effort during the Eleventh Interim Fee Period.

31. The summary is divided according to the project billing codes, which were created by Kramer Levin (in coordination with the other professionals for the Ad Hoc Committee) to best reflect the categories of tasks that it was required to perform in connection with these Chapter 11 Cases. Nevertheless, given the interconnectedness of the issues in these Chapter 11 Cases, certain of these categories may overlap with others.<sup>3</sup>

**A. Business Operations**  
**Billing Code: 00003**  
**(Fees: \$107,770.50 / Hours Billed: 78.50)**

32. During the Eleventh Interim Fee Period, Kramer Levin analyzed documents related to Purdue’s sale of its Avrio assets, including the sale and bid procedures motion, stalking horse

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<sup>3</sup> The fees and hours for each matter listed below reflect the voluntary write-offs and reductions of the Monthly Fee Statements discussed above.

agreement, and asset purchase agreement. This work required coordination among Kramer Levin's bankruptcy, corporate, tax, and IP attorneys. Kramer Levin also spent time preparing for, and participating in, the hearing to approve the bid procedures for sale of Avrio assets.

**C. Case Administration**

**Billing Code: 00004**

**(Fees: \$420.00 / Hours Billed: 0.80)**

33. During the Eleventh Interim Fee Period, Kramer Levin was required to perform discrete administrative tasks necessary to assist the Ad Hoc Committee and its professionals in functioning efficiently, including, but not limited to: maintaining work-in-progress reports and work streams; internal organizational meetings and organizational meetings among professionals; monitoring calendars of critical dates; preparing materials for internal distribution; coordinating conferences and meetings with Ad Hoc Committee professionals; obtaining filed pleadings and maintaining case folders of the same; and routine communications and correspondences.

**D. Employment and Fee Applications**

**Billing Code: 00006**

**(Fees: \$24,638.00 / Hours Billed: 30.00)**

34. In the course of the Eleventh Interim Fee Period, Kramer Levin prepared, filed and served several monthly fee statements, and reviewed and coordinated the monthly fee statements of other Ad Hoc Committee professionals filed in these Chapter 11 Cases.

35. This matter also includes time spent reviewing Kramer Levin's and other Ad Hoc Committee professionals' monthly invoices for compliance with UST Guidelines and for privilege and confidentiality concerns, and coordinating filing of such invoices with the Bankruptcy Court.

**E. Litigation**

**Billing Code: 00008**

**(Fees: \$61,056.00 / Hours Billed: 43.10)**

36. Kramer Levin's fees in this category during the Eleventh Interim Fee Period include, but are not limited to, monitoring Purdue's patent trial against Accord Healthcare,

reviewing the Delaware District Court's decision, preparing reports for the Ad Hoc Committee members on the status of same, and discussing the decision's implications with the Company and the Ad Hoc Committee's financial advisors.

**F. Meetings and Communications with Ad Hoc Committee & Creditors**

**Billing Code: 00009**

**(Fees: \$73,693.00 / Hours Billed: 49.40)**

37. During the Eleventh Interim Fee Period, the Ad Hoc Committee held calls with the full Ad Hoc Committee or a subset thereof once a week (if not more often when the exigencies of the case required). The general purpose of these meetings was to keep the Ad Hoc Committee members informed of developments and current issues in these Chapter 11 Cases, and to discuss and analyze Ad Hoc Committee positions with respect to matters requiring their input. Ad Hoc Committee meetings required preparation by Kramer Levin professionals and other Ad Hoc Committee professionals and often included multiple agenda items.

38. Kramer Levin coordinated with the Ad Hoc Committee's other professionals on these meetings, on tasks including drafting and setting agendas and preparing and reviewing materials.

39. In addition, Kramer Levin provided the Ad Hoc Committee with frequent detailed e-mail updates of recently filed pleadings, case issues and negotiations, and other items relevant to the Chapter 11 Cases.

**G. Plan and Disclosure Statement**

**Billing Code: 00011**

**(Fees: \$249,302.50 / Hours Billed: 185.60)**

40. During the Eleventh Interim Fee Period, Kramer Levin worked to address issues currently on appeal before the Second Circuit with respect to the Confirmation Order and Chapter 11 Plan. To minimize delays following the Second Circuit's decision, Kramer Levin evaluated paths forward under various Second Circuit outcomes. Kramer Levin also had frequent

discussions with the Debtors and the Creditors' Committee, as well as other key constituencies, in an effort to strategize and address issues currently on appeal.

**STATEMENT OF KRAMER LEVIN**

41. The foregoing professional services performed by Kramer Levin were appropriate and necessary. The professional services were in the best interests of the Ad Hoc Committee, the Debtors' estates and other parties-in-interest. Compensation for the foregoing professional services as requested is commensurate with the complexity, importance and nature of the problems, issues or tasks involved. The professional services were performed in an appropriately expeditious and efficient manner.

42. The majority of the services performed by Kramer Levin were rendered by Kramer Levin's Corporate Restructuring and Bankruptcy Group. Kramer Levin has a prominent practice in this area and enjoys a national reputation for its expertise in financial reorganizations and restructurings. The attorneys at Kramer Levin have substantial experience representing creditor groups in many chapter 11 cases. In addition, due to the facts and circumstances of these Chapter 11 Cases, attorneys from Kramer Levin's corporate practice group, as well as attorneys in other specialized areas as necessary, were involved with Kramer Levin's representation of the Ad Hoc Committee. Overall, Kramer Levin brings a particularly high level of skill and knowledge which has inured to the benefit of the Ad Hoc Committee in this case.

43. The professional services performed by Kramer Levin on behalf of the Committee during the Eleventh Interim Fee Period required an aggregate expenditure of approximately 387.40 recorded hours by Kramer Levin's members, counsel, associates and paraprofessionals. Of the aggregate time expended, 223.30 recorded hours were expended by partners and counsel of

Kramer Levin, 139.30 recorded hours were expended by associates, and 24.80 recorded hours were expended by paraprofessionals of Kramer Levin.

44. During the Eleventh Interim Fee Period, Kramer Levin's hourly billing rates for attorneys ranged from \$720 to \$1,800 per hour. Allowance of compensation in the amount requested would result in a blended hourly billing rate for attorneys of approximately \$1,389.60 per hour (based upon 362.60 recorded hours for professionals at Kramer Levin's regular billing rates in effect at the time of the performance of professional services), and a total blended hourly billing rate for Kramer Levin's paraprofessionals of \$524.68 per hour (based upon 24.80 recorded hours for paraprofessionals at Kramer Levin's regular billing rates in effect at the time of the performance of the services).

45. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable bankruptcy cases in a competitive national legal market. As noted, attached hereto in **Exhibit B** is a schedule listing each Kramer Levin professional and paraprofessional who performed services in these Chapter 11 Cases during the Eleventh Interim Fee Period, the hourly rate charged by Kramer Levin for services performed by each individual, and the aggregate number of hours and charges by each individual. Kramer Levin provided a copy of the Application to the Ad Hoc Committee prior to filing the Application and received no objection to its filing.

#### **ACTUAL AND NECESSARY EXPENSES OF KRAMER LEVIN**

46. As set forth in **Exhibit C** hereto, Kramer Levin has disbursed \$14,158.90 as expenses incurred in providing professional services during the Eleventh Interim Fee Period. Pursuant to Kramer Levin's policies (which we believe are comparable to those of other New York City law firms), Kramer Levin has (and will continue) to pay certain expenses of professionals

who work past 8:00 p.m. and on weekends and holidays in the service of its clients, and/or for business travel, including to and from Court hearings or remote meetings. These expenses include meal charges and car fares. Consistent with the U.S. Trustee Guidelines, Kramer Levin has also voluntarily reduced its request for reimbursement for late-working professionals' meal charges to \$20 per meal to the extent that such meal charges were in excess of this limit.

47. With respect to photocopying expenses, Kramer Levin charged \$0.10 per page. Kramer Levin does not charge for facsimile transmissions, other than the cost of long distance facsimiles at applicable toll charge rates, which invariably are less than \$1.25 per page, as permitted by the Guidelines. Each of these categories of expenses falls below the maximum rates set by the Guidelines. These charges are intended to cover Kramer Levin's direct operating costs, which costs are not incorporated into Kramer Levin's hourly billing rates. Only clients who actually use services of the types set forth in Exhibit C are separately charged for such services.

48. In addition, due to the locations of Ad Hoc Committee members, long-distance telephone calls were often required. These disbursements are not included in Kramer Levin's overhead for the purpose of setting billing rates.

49. Kramer Levin has made every effort to minimize its disbursements in these cases. The actual expenses incurred in providing professional services were absolutely necessary, reasonable, economical, and justified under the circumstances to enable Kramer Levin to serve the needs of the Ad Hoc Committee.

#### **THE REQUESTED COMPENSATION SHOULD BE ALLOWED**

50. The Fee Assumption Order provides that Kramer Levin's reasonable and documented fees and expenses shall be subject, *mutatis mutandis*, to the procedures with respect to the authorization of payment of the fees and expenses of the professionals of the Debtors and

the UCC as set forth in the Interim Compensation Order. Therefore, while this Application is not strictly subject to sections 331 and 330 of the Bankruptcy Code, we are guided by such provisions in making this Application. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of 11 U.S.C. § 330 to govern the Bankruptcy Court's award of such compensation.

51. Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded . . . , the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

52. Here, Kramer Levin respectfully submits that the services for which it seeks compensation in this Application were, at the time rendered, believed to be necessary for, beneficial to, and in the best interests of, the Ad Hoc Committee. Kramer Levin further submits that the compensation requested herein is reasonable in light of the nature, extent, and value of

such services to the Ad Hoc Committee. The services rendered by Kramer Levin were consistently performed in a timely and efficient manner commensurate with the complexity, importance, and nature of the issues involved. Kramer Levin respectfully submits that approval of the compensation sought herein is warranted.

**STATEMENT PURSUANT TO APPENDIX B OF THE GUIDELINES**

53. The following is provided in response to the request for additional information set forth in the Guidelines.

- a) Kramer Levin seeks reimbursement of fees and expenses that are permissible under the relevant rules, court orders, and Bankruptcy Code provisions. In addition, Kramer Levin provided voluntary write-offs of expenses during the Eleventh Interim Fee Period in its discretion.
- b) The fees and expenses sought in the Application are billed at rates customarily employed by Kramer Levin, and generally accepted by Kramer Levin's clients. None of the professionals seeking compensation in the Application varied their hourly rate based on the geographic location of the Debtors' cases.
- c) For the Eleventh Interim Fee Period, Kramer Levin is not seeking fees that exceed, in the aggregate, non-itemized budgeted amounts for that period by more than 10%.
- d) This Application includes certain time (and fees) related to preparing, reviewing, or revising fee statements to comply with the local bankruptcy rules and U.S. Trustee guidelines. These fees are reflected in a portion of the amount requested in billing code number 6, Employment and Fee Applications (which matter also includes time spent by Kramer Levin reviewing other professionals' employment and fee applications and reviewing time records to redact or address privileged or other confidential information). Such time was necessary in order to comply with applicable guidelines and the Interim Compensation Order and to file monthly fee applications (which is a distinct requirement in bankruptcy matters).
- e) In connection with the preparation of its monthly invoices, Kramer Levin reviewed its monthly invoices at the time that they were filed for privilege and confidentiality. The Application includes fees incurred in conducting that review.
- f) This Application includes four rate increases since Kramer Levin's retention. On March 16, 2020, March 17, 2021, March 17 2022, and March 13, 2023 (as

amended June 14, 2023) respectively, Kramer Levin filed its Fourth, Sixteenth, Twenty-Eighth, and Fortieth Monthly Fee Statements where it disclosed that it had increased hourly rates charged by professionals as of January 1, 2020, January 1, 2021, January 1, 2022, and January 1, 2023, respectively, in accordance with its annual review process.

**NOTICE**

Notice of this Application has been provided in accordance with the Guidelines and the Interim Compensation Order. Because of the nature of the relief requested, the Ad Hoc Committee submits that such notice is sufficient and that no further notice of the relief requested in the Application need be given to any party.

**CONCLUSION**

WHEREFORE, Kramer Levin respectfully requests that the Bankruptcy Court enter an order: (i) authorizing the Debtors to pay the entirety of the unpaid balance of all approved fees for the Eleventh Interim Period (including holdback amounts) and (ii) granting such other relief as is just and proper.

Dated: New York, New York  
June 14, 2023

Respectfully submitted,

By: /s/ Kenneth H. Eckstein

Kenneth H. Eckstein  
Rachael Ringer  
Caroline F. Gange  
**KRAMER LEVIN NAFTALIS &  
FRANKEL LLP**  
1177 Avenue of the Americas  
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*Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent Litigation  
Claimants*

**Exhibit A**

Certification of Kenneth H. Eckstein

KRAMER LEVIN NAFTALIS & FRANKEL LLP

Kenneth H. Eckstein  
Rachael Ringer  
Caroline F. Gange  
1177 Avenue of the Americas  
New York, New York 10036  
Telephone: (212) 715-9100  
Facsimile: (212) 715-8000

*Attorneys for the Ad Hoc Committee of  
Governmental and Other Contingent Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

----- -X  
:  
**In re:** : **Chapter 11**  
:  
**PURDUE PHARMA L.P., et al.,** : **Case No. 19-23649 (RDD)**  
:  
**Debtors.<sup>1</sup>** :  
:  
----- -X

**CERTIFICATION UNDER GUIDELINES FOR FEES AND DISBURSEMENTS  
FOR PROFESSIONALS IN RESPECT OF ELEVENTH INTERIM APPLICATION OF  
KRAMER LEVIN NAFTALIS & FRANKEL LLP, AS CO-COUNSEL TO THE  
AD HOC COMMITTEE, FOR ALLOWANCE OF COMPENSATION FOR  
PROFESSIONAL SERVICES RENDERED AND FOR REIMBURSEMENT  
OF ACTUAL AND NECESSARY EXPENSES INCURRED FOR THE  
PERIOD FROM JANUARY 1, 2023 THROUGH APRIL 30, 2023**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

I, Kenneth H. Eckstein, hereby certify that:

1. I am a member of Kramer Levin Naftalis & Frankel LLP (the “Applicant” or “Kramer Levin”) and co-counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “Ad Hoc Committee”) of the above-captioned debtors and debtors-in-possession (the “Debtors”) in these chapter 11 cases (the “Chapter 11 Cases”). Kramer Levin submits this eleventh application for interim compensation and reimbursement of expenses in compliance with the Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York adopted by the Bankruptcy Court on January 23, 2013 (the “Local Guidelines”), as amended, and the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, adopted on January 30, 1996 (the “UST Guidelines”), the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 529] (the “Interim Compensation Order,” collectively with the Local Guidelines and UST Guidelines, the “Guidelines”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* [Docket No. 553] (the “Fee Assumption Order”).

2. This certification is made in respect of Kramer Levin’s application, dated June 14, 2023 (the “Application”), for interim compensation and reimbursement of expenses for the period commencing January 1, 2023 through and including April 30, 2023 (the “Eleventh Interim Fee Period”) in accordance with the Guidelines.

3. In respect of Section B.1 of the Local Guidelines, I certify that:

- a. I have read the Application;
- b. to the best of my knowledge, information, and belief formed after reasonable inquiry, the fees and disbursements sought fall within the Local Guidelines and the UST Guidelines;

- c. the fees and disbursements sought are billed at rates in accordance with the practices customarily employed by Kramer Levin and generally accepted by Kramer Levin's clients; and
- d. in providing a reimbursable service, Kramer Levin does not make a profit on that service, whether the service is performed by Kramer Levin in-house or through a third party.

4. I certify that the Creditors' Committee, Debtors, and U.S. Trustee will each be provided with a copy of the Application concurrently with the filing thereof and will have at least 14 days to review such Application prior to any objection deadline with respect thereto.

Dated: New York, New York  
June 14, 2023

/s/ *Kenneth H. Eckstein*  
Kenneth H. Eckstein

**Exhibit B**

**Summary of Professionals – Eleventh Interim Fee Period**  
**January 1, 2023 – April 30, 2023**

Timekeeper	Title	Department	Year Admitted to Bar	Billed Hours	Rate	Amount (\$)
John Bessonette	Partner	Corporate	1999	1.10	1,525	\$1,677.50
David E. Blabey	Partner	Creditor's Rights	2005	22.20	1,300	\$28,860.00
Jonathan S. Caplan	Partner	Intellectual Property	1993	8.70	1,525	\$13,267.50
Kenneth H. Eckstein	Partner	Creditor's Rights	1980	62.40	1,800	\$112,320.00
Roy T. Englert, Jr.	Partner	Litigation	1980	7.20	1,650	\$11,880.00
David J. Fisher	Partner	Corporate	1985	3.30	1,690	\$5,577.00
Marissa J. Holob	Partner	Employee Benefits	2001	2.40	1,415	\$3,396.00
Abraham Reshtick	Partner	Tax	2003	5.50	1,500	\$8,250.00
Rachael Ringer	Partner	Creditor's Rights	2011	7.00	1,415	\$9,905.00
Adam C. Rogoff	Partner	Creditor's Rights	1989	18.20	1,665	\$30,303.00
Jordan M. Rosenbaum	Partner	Corporate	2004	10.90	1,500	\$16,350.00
Joseph Shifer	Special Counsel	Special Counsel	2010	47.10	1,280	\$60,288.00
Jeffrey Taub	Special Counsel	Corporate	2010	7.90	1,280	\$10,112.00
Eleni Zanias	Special Counsel	Corporate	2008	19.40	1,280	\$24,832.00
Lauren Andrews	Associate	Litigation	2017	2.90	1,190	\$3,451.00
Caroline Gange	Associate	Creditor's Rights	2017	123.00	1,220	\$150,060.00
Mariya Khvatskaya	Associate	Tax	2016	4.10	1,250	\$5,125.00
Sealteil, Ortega Rodriguez	Associate	Intellectual Property	2022	4.20	950	\$3,990.00
Ashish Virmani	Associate	Creditor's Rights	2023	2.70	720	\$1,944.00

Timekeeper	Title	Department	Year Admitted to Bar	Billed Hours	Rate	Amount (\$)
Browne Warren	Associate	Employee Benefits	2018	2.40	950	\$2,280.00
Wendy Kane	Paralegal	Creditor's Rights	N/A	24.00	525	\$12,600.00
James McNamara	Paralegal	Creditor's Rights	N/A	0.80	515	\$412.00
<b>TOTAL</b>				<b>387.40</b>		<b>\$516,880.00</b>

**Exhibit C**

**Summary of Expenses/Disbursements**

<b><u>DESCRIPTION</u></b>	<b><u>AMOUNT</u></b>
Bloomberg Law Online Research	\$243.27
Courier Services	\$21.78
Data Hosting Charges	\$10,503.45
In-House Meals	\$80.00
Local Transportation	\$122.95
Pacer Online Research	\$126.00
Photocopying	\$43.40
Telecommunication Charges	\$85.87
Transcript Fees	\$386.40
Westlaw Online Research	\$2,545.78
<b>TOTAL</b>	<b>\$14,158.90</b>

**Exhibit D**

**Detail of Disbursements Made During Eleventh Interim Fee Period**

Kramer Levin



February 28, 2023

Ad Hoc Committee of Governmental and Other  
Contingent  
Litigation Claimants

Invoice #: 876109  
072952  
Page 1

**FOR PROFESSIONAL SERVICES rendered through January 31, 2023.**

Disbursements and Other Charges	6,269.26
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FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339

Kramer Levin Naftalis & Frankel LLP  
1177 Avenue of the Americas, New York, NY 10036  
T 212.715.9100 F 212.715.8000



February 28, 2023  
Invoice #: 876109  
072952

**DISBURSEMENTS AND OTHER CHARGES SUMMARY**

DESCRIPTION	AMOUNT
Data Hosting Charges	\$4,201.38
Telecommunication Charges	10.86
Transcript Fees	102.00
Westlaw Online Research	1,955.02
<b>TOTAL DISBURSEMENTS AND OTHER CHARGES</b>	<b>\$6,269.26</b>

**DISBURSEMENTS AND OTHER CHARGES DETAIL**

**Data Hosting Charges**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
1/3/2023	Eckstein Kenneth H.	Data Hosting Charges	\$2,100.69
1/27/2023	Eckstein Kenneth H.	Data Hosting Charges	\$2,100.69
<b>Subtotal</b>			<b>\$4,201.38</b>

**Telecommunication Charges**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
12/19/2022	Fisher David J.	Telecommunication Charges by David Fisher	\$10.86
<b>Subtotal</b>			<b>\$10.86</b>



February 28, 2023  
Invoice #: 876109  
072952  
Page 2

**Transcript Fees**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
1/30/2023	Gange Caroline	Vendor: Veritext New York Reporting Co., A Veritext Company - Transcript Fees, Description: Hearing Transcript, Transaction Date: 01/30/23, Invoice Number: 6324860	\$102.00
<b>Subtotal</b>			<b>\$102.00</b>

**Westlaw Online Research**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
1/18/2023	Andrews Lauren Cassady	Westlaw Online Research	\$69.22
1/19/2023	Andrews Lauren Cassady	Westlaw Online Research	\$1,885.80
<b>Subtotal</b>			<b>\$1,955.02</b>
<b>TOTAL</b>			<b>\$6,269.26</b>

Kramer Levin



March 27, 2023

Ad Hoc Committee of Governmental and Other  
Contingent  
Litigation Claimants

Invoice #: 876809  
072952  
Page 1

**FOR PROFESSIONAL SERVICES rendered through February 28, 2023.**

Disbursements and Other Charges	2,462.48
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FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339

Kramer Levin Naftalis & Frankel LLP  
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March 27, 2023  
Invoice #: 876809  
072952

**DISBURSEMENTS AND OTHER CHARGES SUMMARY**

DESCRIPTION	AMOUNT
Courier Services	\$21.78
Data Hosting Charges	2,100.69
In-House/Meals	40.00
Local Transportation	122.95
Photocopying	43.40
Telecommunication Charges	56.86
Transcript Fees	76.80
<b>TOTAL DISBURSEMENTS AND OTHER CHARGES</b>	<b>\$2,462.48</b>

**DISBURSEMENTS AND OTHER CHARGES DETAIL**

**Courier Services**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/15/2023	Kane Wendy	Fedex charges by Kane, Wendy on 02/15/2023 (#394654477077)	\$21.78
<b>Subtotal</b>			<b>\$21.78</b>

**Data Hosting Charges**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/28/2023	Eckstein Kenneth H.	Data Hosting Charges	\$2,100.69
<b>Subtotal</b>			<b>\$2,100.69</b>

**In-House/Meals**

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March 27, 2023  
Invoice #: 876809  
072952  
Page 2

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/16/2023	Shifer Joseph A.	In-House/Meals	\$20.00
<b>Subtotal</b>			<b>\$20.00</b>

#### Local Transportation

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/28/2023	Shifer Joseph A.	Local Transportation for SHIFER, JOSEPH A. (OD1177- 3022815020)	\$122.95
<b>Subtotal</b>			<b>\$122.95</b>

#### Meals/In-House

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/28/2023	Shifer Joseph A.	Kosher Deluxe KL02282343146 Joseph A. Shifer	\$20.00
<b>Subtotal</b>			<b>\$20.00</b>

#### Photocopying

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/15/2023	Kane Wendy	Photocopying Kane, Wendy	\$43.40
<b>Subtotal</b>			<b>\$43.40</b>

#### Telecommunication Charges

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
8/15/2022	Gange Caroline	Telecommunication Charges by Caroline Gange	\$15.61



March 27, 2023  
Invoice #: 876809  
072952  
Page 3

8/16/2022	Gange Caroline	Telecommunication Charges by Caroline Gange	\$11.78
11/29/2022	Gange Caroline	Telecommunication Charges by Caroline Gange	\$21.23
1/16/2023	Fisher David J.	Telecommunication Charges by David Fisher	\$3.62
1/18/2023	Fisher David J.	Telecommunication Charges by David Fisher	\$4.62
<b>Subtotal</b>			<b>\$56.86</b>

#### Transcript Fees

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/3/2023	Gange Caroline	Vendor: Veritext New York Reporting Co., A Veritext Company - Transcript Fees, Description: Hearing Transcript, Transaction Date: 02/03/23, Invoice Number: 6340437	\$76.80
<b>Subtotal</b>			<b>\$76.80</b>
<b>TOTAL</b>			<b>\$2,462.48</b>

**Kramer Levin**



April 25, 2023

Ad Hoc Committee of Governmental and Other  
Contingent  
Litigation Claimants

Invoice #: 879676  
072952  
Page 1

**FOR PROFESSIONAL SERVICES rendered through March 31, 2023.**

Disbursements and Other Charges	2,312.73
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FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339

Kramer Levin Naftalis & Frankel LLP  
1177 Avenue of the Americas, New York, NY 10036  
T 212.715.9100 F 212.715.8000



April 25, 2023  
Invoice #: 879676  
072952

**DISBURSEMENTS AND OTHER CHARGES SUMMARY**

DESCRIPTION	AMOUNT
Data Hosting Charges	\$2,100.69
Meals/In-House	40.00
Pacer Online Research	2.90
Telecommunication Charges	10.74
Transcript Fees	158.40
<b>TOTAL DISBURSEMENTS AND OTHER CHARGES</b>	<b>\$2,312.73</b>

**DISBURSEMENTS AND OTHER CHARGES DETAIL**

**Data Hosting Charges**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
3/27/2023	Eckstein Kenneth H.	Data Hosting Charges	\$2,100.69
<b>Subtotal</b>			<b>\$2,100.69</b>

**Meals/In-House**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
3/2/2023	Shifer Joseph A.	Mendy's Kosher Restaurant KL03022375185 Joseph A. Shifer	\$20.00
3/15/2023	Shifer Joseph A.	Pita Grill Kosher - 2nd Ave KL03152340586 Joseph A. Shifer	\$20.00
<b>Subtotal</b>			<b>\$40.00</b>

**Pacer Online Research**



April 25, 2023  
Invoice #: 879676  
072952  
Page 2

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
3/3/2023	Gange Caroline	Pacer Online Research Gange, Caroline	\$0.90
3/30/2023	Gange Caroline	Pacer Online Research Gange, Caroline	\$2.00
<b>Subtotal</b>			<b>\$2.90</b>

#### Telecommunication Charges

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
2/1/2023	Taub Jeffrey	Telecommunication Charges by Jeffrey Taub	\$10.74
<b>Subtotal</b>			<b>\$10.74</b>

#### Transcript Fees

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
3/24/2023	Gange Caroline	Vendor: Veritext New York Reporting Co., A Veritext Company - Transcript Fees, Description: Hearing Transcript, Transaction Date: 03/24/23, Invoice Number: 6452632	\$105.60
3/31/2023	Gange Caroline	Vendor: Veritext New York Reporting Co., A Veritext Company - Transcript Fees, Description: Hearing transcript, Transaction Date: 03/31/23, Invoice Number: 6486328	\$52.80
<b>Subtotal</b>			<b>\$158.40</b>
<b>TOTAL</b>			<b>\$2,312.73</b>

Kramer Levin



May 17, 2023

Ad Hoc Committee of Governmental and Other  
Contingent  
Litigation Claimants

Invoice #: 882119  
072952  
Page 1

**FOR PROFESSIONAL SERVICES rendered through April 30, 2023.**

Disbursements and Other Charges	3,114.43
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FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339

Kramer Levin Naftalis & Frankel LLP  
1177 Avenue of the Americas, New York, NY 10036  
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May 17, 2023  
Invoice #: 882119  
072952

**DISBURSEMENTS AND OTHER CHARGES SUMMARY**

DESCRIPTION	AMOUNT
Bloomberg Law Online Research	\$243.27
Data Hosting Charges	2,100.69
Pacer Online Research	123.10
Telecommunication Charges	7.41
Transcript Fees	49.20
Westlaw Online Research	590.76
<b>TOTAL DISBURSEMENTS AND OTHER CHARGES</b>	<b>\$3,114.43</b>

**DISBURSEMENTS AND OTHER CHARGES DETAIL**

**Bloomberg Law Online Research**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
4/26/2023	Gomez Evelyn	Bloomberg Law Online Research	\$243.27
<b>Subtotal</b>			<b>\$243.27</b>

**Data Hosting Charges**

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
4/27/2023	Eckstein Kenneth H.	Data Hosting Charges	\$2,100.69
<b>Subtotal</b>			<b>\$2,100.69</b>

**Pacer Online Research**

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May 17, 2023  
Invoice #: 882119  
072952  
Page 2

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
4/12/2023	Gange Caroline	Pacer Online Research Gange, Caroline	\$5.40
4/19/2023	Ortega-Rodriguez Sealtiel	Pacer Online Research Ortega-Rodriguez, Sealtiel	\$9.80
4/26/2023	Kane Wendy	Pacer Online Research Kane, Wendy	\$107.90
<b>Subtotal</b>			<b>\$123.10</b>

#### Telecommunication Charges

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
3/6/2023	Shifer Joseph A.	Telecommunication Charges by Joseph Shifer	\$7.41
<b>Subtotal</b>			<b>\$7.41</b>

#### Transcript Fees

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
4/28/2023	Gange Caroline	Vendor: Veritext New York Reporting Co., A Veritext Company - Transcript Fees, Description: Hearing Transcript, Transaction Date: 04/28/23, Invoice Number: 6537009	\$49.20
<b>Subtotal</b>			<b>\$49.20</b>

#### Westlaw Online Research

DATE	TIMEKEEPER	DESCRIPTION	AMOUNT
4/26/2023	Gange Caroline	Westlaw Online Research	\$295.38
4/27/2023	Gange Caroline	Westlaw Online Research	\$295.38



May 17, 2023  
Invoice #: 882119  
072952  
Page 3

<b>Subtotal</b>	<b>\$590.76</b>
<b>TOTAL</b>	<b>\$3,114.43</b>

**Exhibit E**

**Summary of Time by Billing Category**

PURDUE PHARMA L.P., ET AL. AD HOC COMMITTEE			
Time by Billing Category for January 1, 2023 through April 30, 2023			
<b>Matter Number</b>	<b>Matter Name</b>	<b>Hours</b>	<b>Fees</b>
072952-00003	Business Operations	78.50	\$107,770.50
072952-00004	Case Administration	0.80	\$420.00
072952-00006	Employment and Fee Applications	30.00	\$24,638.00
072952-00008	Litigation	43.10	\$61,056.00
072952-00009	Meetings and Communications with Ad-Hoc Committee & Creditors	49.40	\$73,693.00
072952-00011	Plan and Disclosure Statement	185.60	\$249,302.50
<b>TOTAL</b>		<b>387.40</b>	<b>\$516,880.00</b>

**Exhibit F**

**Final Detailed Time Records – Eleventh Interim Fee Period**

**January 1, 2023 through April 30, 2023**

Kramer Levin



February 28, 2023

Ad Hoc Committee of Governmental and Other  
Contingent  
Litigation Claimants

Invoice #: 876109  
072952  
Page 1

**FOR PROFESSIONAL SERVICES rendered through January 31, 2023.**

Fees	\$46,013.00
Disbursements and Other Charges	6,269.26
<b>Total Current Invoice</b>	<b>\$52,282.26</b>

FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339

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February 28, 2023  
Invoice #: 876109  
072952  
Page 2

**MATTER SUMMARY**

**For professional services rendered through January 31, 2023 in connection with the following matters:**

Matter	Matter Name	Fees	Disbs	Total
072952-00001	Asset Analysis and Recovery	\$0.00	\$6,269.26	<b>\$6,269.26</b>
072952-00003	Business Operations	4,402.00	0.00	<b>4,402.00</b>
072952-00004	Case Administration	52.50	0.00	<b>52.50</b>
072952-00006	Employment and Fee Applications	4,638.50	0.00	<b>4,638.50</b>
072952-00008	Litigation	11,065.00	0.00	<b>11,065.00</b>
072952-00009	Meetings and Communications with Ad-Hoc Committee & Creditors	18,488.50	0.00	<b>18,488.50</b>
072952-00011	Plan and Disclosure Statement	7,366.50	0.00	<b>7,366.50</b>
<b>Subtotal</b>		<b>46,013.00</b>	<b>6,269.26</b>	<b>52,282.26</b>
<b>TOTAL CURRENT INVOICE</b>				<b>\$52,282.26</b>



February 28, 2023  
Invoice #: 876109  
072952-00003  
Page 3

**Business Operations**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	1.70	\$3,060.00
Gange, Caroline	Associate	1.10	1,342.00
<b>TOTAL FEES</b>		<b>2.80</b>	<b>\$4,402.00</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
1/23/2023	Eckstein, Kenneth H.	Prep for (0.2) and attend business update call with Working Group, M. Kesselman, M. Huebner (1.1).	1.30	\$2,340.00
1/23/2023	Gange, Caroline	Attend business update meeting with Company.	1.10	1,342.00
1/30/2023	Eckstein, Kenneth H.	Correspond w/ FTI re retention bonuses (0.4).	0.40	720.00
<b>TOTAL</b>			<b>2.80</b>	<b>\$4,402.00</b>



February 28, 2023  
Invoice #: 876109  
072952-00004  
Page 4

**Case Administration**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Kane, Wendy	Paralegal	0.10	\$52.50
<b>TOTAL FEES</b>		<b>0.10</b>	<b>\$52.50</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
1/20/2023	Kane, Wendy	Register KL team for hearing and email C. Gange re same.	0.10	\$52.50
<b>TOTAL</b>			<b>0.10</b>	<b>\$52.50</b>



February 28, 2023  
Invoice #: 876109  
072952-00006  
Page 5

#### Employment and Fee Applications

#### PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Gange, Caroline	Associate	2.30	\$2,806.00
Kane, Wendy	Paralegal	3.00	1,575.00
McNamara, James	Paralegal	0.50	257.50
<b>TOTAL FEES</b>		<b>5.80</b>	<b>\$4,638.50</b>

#### PROFESSIONAL SERVICES DETAIL

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
1/10/2023	Kane, Wendy	Review revised December fee statement.	0.20	\$105.00
1/11/2023	Kane, Wendy	Prepare November fee statement and exhibits (0.7) and email C. Gange re same (0.1); file Otterbourg November fee statement (0.2).	1.00	525.00
1/12/2023	Gange, Caroline	Review November fee statements for privilege/confidentiality and prep for filing.	1.30	1,586.00
1/13/2023	Gange, Caroline	Review November fee statement for privilege/confidentiality and compliance with UST guidelines.	0.30	366.00



February 28, 2023  
Invoice #: 876109  
072952-00006  
Page 6

**Employment and Fee Applications**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
1/13/2023	Kane, Wendy	Prepare KL November fee statement for filing and file same (0.3); emails w/ other professionals re fee statements (0.2); file FTI October and November fee statements and Gilbert November fee statement (0.4).	0.90	472.50
1/26/2023	Gange, Caroline	Review December fee statement for privilege/confidentiality and compliance with UST guidelines.	0.70	854.00
1/27/2023	Kane, Wendy	Prepare December fee statement and exhibits and email C. Gange re same.	0.50	262.50
1/31/2023	Kane, Wendy	Emails w/ C. Gange and J. McNamara re fee statements (0.1); prepare other professionals' fee statements for filing and emails re same (0.3).	0.40	210.00
1/31/2023	McNamara, James	File and serve HL monthly fee statements; correspondence w/ KL and HL teams re same.	0.50	257.50
<b>TOTAL</b>			<b>5.80</b>	<b>\$4,638.50</b>



February 28, 2023  
Invoice #: 876109  
072952-00008  
Page 7

**Litigation**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Blabey, David E.	Partner	0.50	\$650.00
Englert, Jr., Roy T.	Partner	3.40	5,610.00
Andrews, Lauren Cassady	Associate	2.50	2,975.00
Gange, Caroline	Associate	1.50	1,830.00
<b>TOTAL FEES</b>		<b>7.90</b>	<b>\$11,065.00</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
1/12/2023	Blabey, David E.	Call with M. Tobak and email to K. Eckstein and R. Ringer re preliminary injunction motion.	0.50	\$650.00
1/18/2023	Englert, Jr., Roy T.	Correspond with L. Andrews re research, in anticipation of re Second Circuit timing (0.3); research re same (1.6).	1.90	3,135.00
1/18/2023	Andrews, Lauren Cassady	Conduct research re Second Circuit (0.6); correspondence with R. Englert re research (0.3).	0.90	1,071.00
1/19/2023	Englert, Jr., Roy T.	Additional discussion with L. Andrews re Second Circuit decision.	0.80	1,320.00
1/19/2023	Andrews, Lauren Cassady	Conduct research re Second Circuit decision (0.8); correspondence with R. Englert re research (0.8).	1.60	1,904.00



February 28, 2023  
Invoice #: 876109  
072952-00008  
Page 8

**Litigation**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
1/24/2023	Englert, Jr., Roy T.	Correspondence w/ K. Eckstein re results of research on Second Circuit decision.	0.70	1,155.00
1/24/2023	Gange, Caroline	Attend hearing re preliminary injunction extension.	1.50	1,830.00
<b>TOTAL</b>			<b>7.90</b>	<b>\$11,065.00</b>



February 28, 2023  
Invoice #: 876109  
072952-00009  
Page 9

**Meetings and Communications with Ad-Hoc Committee & Creditors**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Blabey, David E.	Partner	1.00	\$1,300.00
Eckstein, Kenneth H.	Partner	4.40	7,920.00
Englert, Jr., Roy T.	Partner	1.00	1,650.00
Ringer, Rachael L.	Partner	1.00	1,415.00
Rogoff, Adam C.	Partner	0.70	1,165.50
Rosenbaum, Jordan M.	Partner	1.00	1,500.00
Gange, Caroline	Associate	2.90	3,538.00
<b>TOTAL FEES</b>		<b>12.00</b>	<b>\$18,488.50</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
1/3/2023	Eckstein, Kenneth H.	Attend Working Group call (0.8).	0.80	\$1,440.00
1/10/2023	Eckstein, Kenneth H.	Attend Working Group meeting (0.8).	0.80	1,440.00
1/10/2023	Gange, Caroline	Attend portion of working group call.	0.50	610.00
1/17/2023	Eckstein, Kenneth H.	Attend Working Group call (0.6).	0.60	1,080.00
1/17/2023	Gange, Caroline	Attend working group call and emails w/ K. Eckstein re agenda for upcoming call.	0.50	610.00
1/25/2023	Rogoff, Adam C.	Participate in portion AHC update call.	0.70	1,165.50



February 28, 2023  
Invoice #: 876109  
072952-00009  
Page 10

**Meetings and Communications with Ad-Hoc Committee & Creditors**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
1/25/2023	Rosenbaum, Jordan M.	Attend case status call with AHC.	1.00	1,500.00
1/25/2023	Englert, Jr., Roy T.	Participate in case status call with AHC.	1.00	1,650.00
1/25/2023	Ringer, Rachael L.	Attend AHC call re: Purdue updates (1.0).	1.00	1,415.00
1/25/2023	Blabey, David E.	Attend ad hoc Committee call.	1.00	1,300.00
1/25/2023	Eckstein, Kenneth H.	Prep for (0.4) and attend AHC call (1.0).	1.40	2,520.00
1/25/2023	Gange, Caroline	Prep for AHC call (0.3) and attend same (1.0).	1.30	1,586.00
1/31/2023	Eckstein, Kenneth H.	Attend Working Group call (0.8).	0.80	1,440.00
1/31/2023	Gange, Caroline	Attend portion of working group call.	0.60	732.00
<b>TOTAL</b>			<b>12.00</b>	<b>\$18,488.50</b>



February 28, 2023  
Invoice #: 876109  
072952-00011  
Page 11

**Plan and Disclosure Statement**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	4.00	\$7,200.00
Rogoff, Adam C.	Partner	0.10	166.50
<b>TOTAL FEES</b>		<b>4.10</b>	<b>\$7,366.50</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
1/3/2023	Eckstein, Kenneth H.	Correspond w/ HL re Avrio (0.4); correspond w/ KL team re plan issues (0.5).	0.90	\$1,620.00
1/13/2023	Eckstein, Kenneth H.	Call with M. Kesselman re Newco and plan issues (0.4); correspond with Debtor and KL team re Second Circuit and plan process (0.5).	0.90	1,620.00
1/17/2023	Eckstein, Kenneth H.	Follow up with M. Kesselman re plan issues (0.3); correspond w/ FTI and HL re plan issues and Avrio sale (0.4).	0.70	1,260.00
1/25/2023	Rogoff, Adam C.	Coordinate with J. Rosenblum on Plan and emergence issues and discussions with Company re same; emails with K. Eckstein re same.	0.10	166.50
1/25/2023	Eckstein, Kenneth H.	Calls and correspond w/ Debtors re Second Circuit and business report (0.8).	0.80	1,440.00



February 28, 2023  
Invoice #: 876109  
072952-00011  
Page 12

**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
1/30/2023	Eckstein, Kenneth H.	Correspond w/ Debtors re plan process (0.3).	0.30	540.00
1/31/2023	Eckstein, Kenneth H.	Correspond w/ Debtors re plan implementation process (0.4).	0.40	720.00
<b>TOTAL</b>			<b>4.10</b>	<b>\$7,366.50</b>

Kramer Levin



March 27, 2023

Ad Hoc Committee of Governmental and Other  
Contingent  
Litigation Claimants

Invoice #: 876809  
072952  
Page 1

**FOR PROFESSIONAL SERVICES rendered through February 28, 2023.**

Fees	\$111,217.50
Disbursements and Other Charges	2,462.48
<b>TOTAL BALANCE DUE</b>	<b>\$113,679.98</b>

FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339

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March 27, 2023  
Invoice #: 876809  
072952  
Page 2

**MATTER SUMMARY**

**For professional services rendered through February 28, 2023 in connection with the following matters:**

Matter	Matter Name	Fees	Disbs	Total
072952-00001	Asset Analysis and Recovery	\$0.00	\$2,462.48	<b>\$2,462.48</b>
072952-00006	Employment and Fee Applications	11,600.50	0.00	<b>11,600.50</b>
072952-00009	Meetings and Communications with Ad-Hoc Committee & Creditors	12,815.00	0.00	<b>12,815.00</b>
072952-00011	Plan and Disclosure Statement	86,802.00	0.00	<b>86,802.00</b>
<b>Subtotal</b>		<b>111,217.50</b>	<b>2,462.48</b>	<b>113,679.98</b>
<b>TOTAL CURRENT INVOICE</b>				<b>\$113,679.98</b>



March 27, 2023  
Invoice #: 876809  
072952-00001  
Page 3

**Asset Analysis and Recovery**

**DISBURSEMENTS AND OTHER CHARGES SUMMARY**

DESCRIPTION	AMOUNT
Courier Services	\$21.78
Data Hosting Charges	2,100.69
In-House/Meals	40.00
Local Transportation	122.95
Photocopying	43.40
Telecommunication Charges	56.86
Transcript Fees	76.80
<b>TOTAL DISBURSEMENTS AND OTHER CHARGES</b>	<b>\$2,462.48</b>



March 27, 2023  
Invoice #: 876809  
072952-00006  
Page 4

#### **Employment and Fee Applications**

#### **PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Gange, Caroline	Associate	6.80	\$8,296.00
Kane, Wendy	Paralegal	6.00	3,150.00
McNamara, James	Paralegal	0.30	154.50
<b>TOTAL FEES</b>		<b>13.10</b>	<b>\$11,600.50</b>

#### **PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/1/2023	McNamara, James	File and serve KL thirty-ninth fee application and correspondence w/ C. Gange re same.	0.30	\$154.50
2/6/2023	Kane, Wendy	Prepare tenth interim fee application (2.5); email C. Gange re same (0.1); review January fee statement for compliance with local rules and UST guidelines (0.4); email F. Arias re same (0.2).	3.20	1,680.00
2/7/2023	Kane, Wendy	Revise fee application to include blended rates.	0.20	105.00
2/8/2023	Gange, Caroline	Review and edit tenth interim fee applications.	1.30	1,586.00
2/8/2023	Kane, Wendy	Compile fee statements for interim period and email C. Gange re same.	0.10	52.50
2/9/2023	Gange, Caroline	Review tenth interim fee application.	0.40	488.00



March 27, 2023  
Invoice #: 876809  
072952-00006  
Page 5

#### Employment and Fee Applications

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/10/2023	Gange, Caroline	Review and edit tenth interim fee applications.	0.80	976.00
2/10/2023	Kane, Wendy	Compile interim fee application for distribution to Committee; email C. Gange re same.	0.20	105.00
2/14/2023	Gange, Caroline	Multiple edits to tenth interim fee application to prepare for filing.	2.40	2,928.00
2/14/2023	Kane, Wendy	Emails w/ C. Gange and AHC professionals re interim fee applications (0.3); prepare other professionals fee applications for filing (0.2); review Kramer Levin interim fee application (0.3); file fee applications for Houlihan, Kramer Levin, Gilbert, FTI, and Otterbourg (1.1); service of same on notice parties (0.2).	2.10	1,102.50
2/15/2023	Kane, Wendy	Prepare letter to Judge Lane and send courtesy copies of interim fee applications.	0.20	105.00
2/21/2023	Gange, Caroline	Review January fee statements for privilege/confidentiality and compliance with UST guidelines.	0.80	976.00
2/22/2023	Gange, Caroline	Review January fee statement for privilege/confidentiality and compliance with UST guidelines.	1.10	1,342.00
<b>TOTAL</b>			<b>13.10</b>	<b>\$11,600.50</b>



March 27, 2023  
Invoice #: 876809  
072952-00009  
Page 6

**Meetings and Communications with Ad-Hoc Committee & Creditors**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	4.30	\$7,740.00
Ringer, Rachael L.	Partner	1.00	1,415.00
Gange, Caroline	Associate	3.00	3,660.00
<b>TOTAL FEES</b>		<b>8.30</b>	<b>\$12,815.00</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/8/2023	Ringer, Rachael L.	Attend portion of call with the States group re: plan next steps (1.0).	1.00	\$1,415.00
2/8/2023	Eckstein, Kenneth H.	Prepare for (0.10) and attend call with Working Group and other states re case status, alternatives (1.2).	1.30	2,340.00
2/8/2023	Gange, Caroline	Attend call with States group re second circuit and other updates/next steps.	1.20	1,464.00
2/14/2023	Eckstein, Kenneth H.	Prepare for (0.1) and attend Working Group call re plan issues (1.1).	1.20	2,160.00
2/14/2023	Gange, Caroline	Attend working group call re next steps re plan.	1.10	1,342.00
2/21/2023	Eckstein, Kenneth H.	Attend Working Group call (0.6).	0.60	1,080.00
2/21/2023	Gange, Caroline	Prepare for (0.1) and attend working group call (0.6).	0.70	854.00



March 27, 2023  
Invoice #: 876809  
072952-00009  
Page 7

**Meetings and Communications with Ad-Hoc Committee & Creditors**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/28/2023	Eckstein, Kenneth H.	Prepare for (0.4) and attend Working Group call (0.8).	1.20	2,160.00
<b>TOTAL</b>			<b>8.30</b>	<b>\$12,815.00</b>



March 27, 2023  
Invoice #: 876809  
072952-00011  
Page 8

**Plan and Disclosure Statement**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	6.00	\$10,800.00
Ringer, Rachael L.	Partner	1.70	2,405.50
Rogoff, Adam C.	Partner	12.50	20,812.50
Rosenbaum, Jordan M.	Partner	2.30	3,450.00
Shifer, Joseph A.	Spec Counsel	18.30	23,424.00
Taub, Jeffrey	Spec Counsel	2.80	3,584.00
Gange, Caroline	Associate	18.30	22,326.00
<b>TOTAL FEES</b>		<b>61.90</b>	<b>\$86,802.00</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/1/2023	Rogoff, Adam C.	Emails and call with J. Rosenblum and K. Eckstein re plan implementation (0.3); review materials re same (0.2).	0.50	\$832.50
2/1/2023	Rosenbaum, Jordan M.	Call with FTI and HL re plan status (0.5); call with K. Eckstein and A. Rogoff re plan (0.3); review of plan documents (0.2).	1.00	1,500.00
2/1/2023	Ringer, Rachael L.	Call with KL, FTI and HL team re: plan updates (0.5).	0.50	707.50



March 27, 2023  
 Invoice #: 876809  
 072952-00011  
 Page 9

**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/1/2023	Eckstein, Kenneth H.	Call and emails w/ A. Rogoff and J. Rosenblum re company business report, plan discussions (0.3); call w/ KL, FTI and Houliahn team re same (0.5).	0.80	1,440.00
2/1/2023	Taub, Jeffrey	T/c w/ KL, FTI and Houlihan teams re emergence prep (0.5); review Purdue presentation re same (0.2); follow-up corporate and bankruptcy teams re same (0.5).	1.20	1,536.00
2/2/2023	Rosenbaum, Jordan M.	Call with debtor and FTI and HL and Debtors re plan issues.	0.90	1,350.00
2/2/2023	Taub, Jeffrey	Attend all hands t/c w/ FTI, HL and Debtors re emergence matters.	0.90	1,152.00
2/6/2023	Rogoff, Adam C.	Prepare for and participate in portion of call with FTI, HL, KL and Debtors re plan structure (0.4); review materials re same (0.4); email R. Ringer re same (0.1).	0.90	1,498.50
2/6/2023	Ringer, Rachael L.	Attend portion of call with Debtors/FTI/HL/Sacklers re: next steps on plan (0.4).	0.40	566.00
2/8/2023	Eckstein, Kenneth H.	Follow up with A. Rogoff re plan presentation and issues list (0.4).	0.40	720.00
2/10/2023	Rogoff, Adam C.	Participate in call with K. Eckstein, M. Heubner, E. Vonnegut, G. Uzzi, J. Ball, J. Rosen and R. Ringer re plan structure.	0.80	1,332.00
2/10/2023	Eckstein, Kenneth H.	Prepare for (0.4) and attend call with Sackler and Company re plan issues (0.8).	1.20	2,160.00



March 27, 2023  
 Invoice #: 876809  
 072952-00011  
 Page 10

**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/10/2023	Ringer, Rachael L.	Call with Debtors and Sacklers re: plan updates (0.8).	0.80	1,132.00
2/10/2023	Gange, Caroline	Review issues related to plan and emails w/ K. Eckstein and A. Rogoff re same.	0.70	854.00
2/13/2023	Rogoff, Adam C.	Prepare for and participate in call with C. Gange, J. Rosenbaum and J. Taub re memo for clients re status (0.4); review C. Gange email and attachments re same (0.3); emails with K. Eckstein re same (0.2).	0.90	1,498.50
2/13/2023	Rosenbaum, Jordan M.	Call with A. Rogoff, J. Taub and C. Gange re plan strcutre.	0.40	600.00
2/13/2023	Eckstein, Kenneth H.	Review plan materials (0.5), emails with A. Rogoff, J. Shifer re memo/power point for clients (0.3); review same (0.4).	1.20	2,160.00
2/13/2023	Taub, Jeffrey	Prepare for (0.3) and attend internal KL call w/ corporate and bankruptcy re plan structure (0.4).	0.70	896.00
2/13/2023	Gange, Caroline	Call w/ A. Rogoff, J. Taub and J. Rosenbaum re next steps on plan (0.4); follow-up edits to presentation re same (0.6).	1.00	1,220.00
2/14/2023	Rogoff, Adam C.	Review status analysis for clients; emails, meeting and coordination with K. Eckstein and C. Gange re same; review materials re same.	0.50	832.50
2/15/2023	Gange, Caroline	Review issues re plan emergence and next steps.	3.30	4,026.00



March 27, 2023  
Invoice #: 876809  
072952-00011  
Page 11

**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/16/2023	Rogoff, Adam C.	Review status analysis for clients (0.4); emails, call and coordination with K. Eckstein re same (0.1); call with J. Shifer re same (0.8); review materials re same (0.5).	1.80	2,997.00
2/16/2023	Shifer, Joseph A.	Call with A. Rogoff re plan deck (0.8), review plan documents (1.4), draft deck re same (2.3).	4.50	5,760.00
2/16/2023	Gange, Caroline	Review plan emergence issues and research re same.	2.00	2,440.00
2/17/2023	Shifer, Joseph A.	Continue drafting plan presentation (3.9); emails with A. Rogoff re same (0.4).	4.30	5,504.00
2/17/2023	Gange, Caroline	Review issues related to plan next steps and emergence.	4.00	4,880.00
2/19/2023	Rogoff, Adam C.	Review status analysis for clients (0.6); emails with J. Shifer re same (0.5); review materials re same (0.2).	1.30	2,164.50
2/19/2023	Shifer, Joseph A.	Emails with A. Rogoff re plan deck (0.4); revisions to same (2.8).	3.20	4,096.00
2/20/2023	Rogoff, Adam C.	Review status analysis for clients (0.5); emails with J. Shifer re same (0.3); review materials re same (3.1).	3.90	6,493.50
2/20/2023	Shifer, Joseph A.	Emails with A. Rogoff re alternative plan and review revised deck.	0.40	512.00



March 27, 2023  
 Invoice #: 876809  
 072952-00011  
 Page 12

**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
2/21/2023	Rogoff, Adam C.	Review status analysis for clients (0.4); emails with J. Shifer re same (0.1); review revised materials re same (0.2); emails and coordination with K. Eckstein re client analysis (0.2); call with K. Eckstein re plan materials (0.6).	1.50	2,497.50
2/21/2023	Eckstein, Kenneth H.	Call with A. Rogoff re: plan materials and issues (0.6).	0.60	1,080.00
2/21/2023	Shifer, Joseph A.	Revisions to alternative plan deck (0.5); emails with A. Rogoff and K. Eckstein re same (0.2).	0.70	896.00
2/23/2023	Eckstein, Kenneth H.	Review plan power point/memo (0.9), comment re: same (0.3).	1.20	2,160.00
2/23/2023	Gange, Caroline	Review revised plan presentation (0.3); review recent rulings re precedential effect (1.6).	1.90	2,318.00
2/28/2023	Rogoff, Adam C.	Review status analysis for clients; emails and calls with J. Shifer re same.	0.40	666.00
2/28/2023	Eckstein, Kenneth H.	Call with J. Shifer and C. Gange re alternative plan memo (0.6).	0.60	1,080.00
2/28/2023	Shifer, Joseph A.	Conf with K. Eckstein and C. Gange re presentation (0.6); confs with A. Rogoff re same (0.2), review and revise same (4.4).	5.20	6,656.00
2/28/2023	Gange, Caroline	Call w/ K. Eckstein and J. Shifer re plan options (0.6); draft presentation re same (2.7); research issues re same (2.1).	5.40	6,588.00
<b>TOTAL</b>			<b>61.90</b>	<b>\$86,802.00</b>

Kramer Levin



April 25, 2023

Ad Hoc Committee of Governmental and Other  
Contingent  
Litigation Claimants

Invoice #: 879676  
072952  
Page 1

**FOR PROFESSIONAL SERVICES rendered through March 31, 2023.**

Fees	\$113,742.00
Disbursements and Other Charges	2,312.73
<b>TOTAL BALANCE DUE</b>	<b>\$116,054.73</b>

FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339

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April 25, 2023  
Invoice #: 879676  
072952  
Page 2

**MATTER SUMMARY**

**For professional services rendered through March 31, 2023 in connection with the following matters:**

Matter	Matter Name	Fees	Disbs	Total
072952-00001	Asset Analysis and Recovery	\$0.00	\$2,312.73	<b>\$2,312.73</b>
072952-00004	Case Administration	105.00	0.00	<b>105.00</b>
072952-00006	Employment and Fee Applications	6,126.00	0.00	<b>6,126.00</b>
072952-00008	Litigation	5,547.00	0.00	<b>5,547.00</b>
072952-00009	Meetings and Communications with Ad-Hoc Committee & Creditors	22,307.50	0.00	<b>22,307.50</b>
072952-00011	Plan and Disclosure Statement	79,656.50	0.00	<b>79,656.50</b>
<b>Subtotal</b>		<b>113,742.00</b>	<b>2,312.73</b>	<b>116,054.73</b>
<b>TOTAL CURRENT INVOICE</b>				<b>\$116,054.73</b>



April 25, 2023  
Invoice #: 879676  
072952-00004  
Page 3

**Case Administration**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Kane, Wendy	Paralegal	0.20	\$105.00
<b>TOTAL FEES</b>		<b>0.20</b>	<b>\$105.00</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/15/2023	Kane, Wendy	Register KL team for hearing.	0.10	\$52.50
3/27/2023	Kane, Wendy	Call w/ chambers re hearing and email C. Gange re same.	0.10	52.50
<b>TOTAL</b>			<b>0.20</b>	<b>\$105.00</b>



April 25, 2023  
Invoice #: 879676  
072952-00006  
Page 4

#### **Employment and Fee Applications**

#### **PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Gange, Caroline	Associate	3.30	\$4,026.00
Kane, Wendy	Paralegal	4.00	2,100.00
<b>TOTAL FEES</b>		<b>7.30</b>	<b>\$6,126.00</b>

#### **PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/1/2023	Gange, Caroline	Review January fee statement for privilege/confidentiality and compliance with UST guidelines.	0.30	\$366.00
3/1/2023	Kane, Wendy	Prepare January fee statement and exhibits (0.4); emails w/ C. Gange and D. Indelicate re same (0.2).	0.60	315.00
3/2/2023	Kane, Wendy	Update January fee statement exhibits and email C. Gange re same.	0.40	210.00
3/3/2023	Kane, Wendy	Compile fee statement for distribution to Committee and email C. Gange.	0.10	52.50
3/7/2023	Kane, Wendy	Review February fee statement for compliance with local rules and UST guidelines.	0.50	262.50
3/13/2023	Gange, Caroline	Review final draft fee statements and emails w/ W. Kane re same (0.3); review fee examiner report (0.2).	0.50	610.00



April 25, 2023  
 Invoice #: 879676  
 072952-00006  
 Page 5

#### **Employment and Fee Applications**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/13/2023	Kane, Wendy	Review February fee statement for compliance with UST guidelines and local rules (0.7); emails w/ C. Gange and P. Holland re fee statements (0.1); update Kramer Levin fee statement (0.2); file Gilbert and Kramer Levin fee statements (0.3).	1.30	682.50
3/14/2023	Gange, Caroline	Review fee examiner report and draft response to same.	0.80	976.00
3/21/2023	Gange, Caroline	Review draft interim fee order.	0.20	244.00
3/22/2023	Kane, Wendy	Prepare February fee statement and exhibits (0.3).	0.30	157.50
3/27/2023	Gange, Caroline	Review February fee statement for privilege/confidentiality and compliance with UST guidelines.	1.00	1,220.00
3/28/2023	Gange, Caroline	Review AHC professionals' fee statements for circulation to AHC.	0.50	610.00
3/28/2023	Kane, Wendy	Revise and compile February fee statement (0.3); email C. Gange re same (0.1).	0.40	210.00
3/30/2023	Kane, Wendy	File FTI fee statements and email E. Kurtz re same.	0.30	157.50
3/31/2023	Kane, Wendy	Correspondence w/ F. Arias and C. Gange re February fee statement.	0.10	52.50
<b>TOTAL</b>			<b>7.30</b>	<b>\$6,126.00</b>



April 25, 2023  
Invoice #: 879676  
072952-00008  
Page 6

**Litigation**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	0.80	\$1,440.00
Englert, Jr., Roy T.	Partner	0.50	825.00
Andrews, Lauren Cassady	Associate	0.40	476.00
Gange, Caroline	Associate	2.30	2,806.00
<b>TOTAL FEES</b>		<b>4.00</b>	<b>\$5,547.00</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/15/2023	Andrews, Lauren Cassady	Review correspondence from R. Englert and legal research re appellate issues.	0.40	\$476.00
3/21/2023	Eckstein, Kenneth H.	Attend portion of omnibus hearing re fees, adversary (0.8).	0.80	1,440.00
3/21/2023	Gange, Caroline	Prep for and participate in hearing re fees, adversary proceedings.	2.30	2,806.00
3/28/2023	Englert, Jr., Roy T.	Email K. Eckstein and D. Blabey re potential precedential effect of recent rulings on pending Second Circuit case.	0.50	825.00
<b>TOTAL</b>			<b>4.00</b>	<b>\$5,547.00</b>



April 25, 2023  
Invoice #: 879676  
072952-00009  
Page 7

**Meetings and Communications with Ad-Hoc Committee & Creditors**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	4.90	\$8,820.00
Ringer, Rachael L.	Partner	0.90	1,273.50
Shifer, Joseph A.	Spec Counsel	4.30	5,504.00
Gange, Caroline	Associate	5.50	6,710.00
<b>TOTAL FEES</b>		<b>15.60</b>	<b>\$22,307.50</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/3/2023	Gange, Caroline	Draft client update re HRT motion, fees and related matters.	1.30	\$1,586.00
3/9/2023	Ringer, Rachael L.	Attend portion of call with working group re: plan presentation (0.9).	0.90	1,273.50
3/9/2023	Eckstein, Kenneth H.	Attend call with HL, FTI, Working Group re Plan options, financial report, next steps (1.4).	1.40	2,520.00
3/9/2023	Shifer, Joseph A.	Prep for (0.4) and attend working group call re plan options (1.4).	1.80	2,304.00
3/9/2023	Gange, Caroline	Attend working group call re next steps on plan.	1.40	1,708.00
3/14/2023	Eckstein, Kenneth H.	Attend Working Group call (1.0).	1.00	1,800.00
3/14/2023	Shifer, Joseph A.	Attend call with working group (1.0).	1.00	1,280.00



April 25, 2023  
Invoice #: 879676  
072952-00009  
Page 8

**Meetings and Communications with Ad-Hoc Committee & Creditors**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/14/2023	Gange, Caroline	Attend portion of working group call re plan process and insurance updates.	0.70	854.00
3/24/2023	Eckstein, Kenneth H.	Prepare for (0.3) and attend call with State Working Groups re plan options and issues (1.2).	1.50	2,700.00
3/24/2023	Shifer, Joseph A.	Prep for (0.3) and attend call with State working group re plan alternatives (1.2).	1.50	1,920.00
3/24/2023	Gange, Caroline	Prep for (0.2) and attend States call re next steps on plan (1.2).	1.40	1,708.00
3/30/2023	Eckstein, Kenneth H.	Prepare for (0.3) and attend Working Group call re plan (0.7).	1.00	1,800.00
3/30/2023	Gange, Caroline	Attend working group call re next steps on plan.	0.70	854.00
<b>TOTAL</b>			<b>15.60</b>	<b>\$22,307.50</b>



April 25, 2023  
Invoice #: 879676  
072952-00011  
Page 9

**Plan and Disclosure Statement**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Eckstein, Kenneth H.	Partner	12.20	\$21,960.00
Rogoff, Adam C.	Partner	4.90	8,158.50
Shifer, Joseph A.	Spec Counsel	24.50	31,360.00
Gange, Caroline	Associate	14.90	18,178.00
<b>TOTAL FEES</b>		<b>56.50</b>	<b>\$79,656.50</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/1/2023	Rogoff, Adam C.	Review plan presentation for clients; emails and coordination with J. Shifer re same.	0.40	\$666.00
3/1/2023	Eckstein, Kenneth H.	Review plan memo (0.4), emails with J. Shifer re same (0.4).	0.80	1,440.00
3/1/2023	Shifer, Joseph A.	Revisions to plan presentation (3.6) and correspondence with K. Eckstein, A. Rogoff, and C. Gange re same (1.1).	4.70	6,016.00
3/1/2023	Gange, Caroline	Further revisions to plan presentation (0.5); discuss same w/ J. Shifer (0.3).	0.80	976.00
3/2/2023	Rogoff, Adam C.	Review plan presentation for clients (0.3); review revised materials (0.4); calls and emails with K. Eckstein, J. Shifer and C. Gange re same (1.0).	1.70	2,830.50



April 25, 2023  
Invoice #: 879676  
072952-00011  
Page 10

**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/2/2023	Shifer, Joseph A.	Calls and emails with K. Eckstein, A. Rogoff, and C. Gange re alternative plan presentation (2.1), numerous revisions to same (2.2).	4.30	5,504.00
3/2/2023	Gange, Caroline	Review and edit presentation re plan options (1.5); multiple meetings and calls w/ K. Eckstein, A. Rogoff, J. Shifer re same (2.3); research issues re same (0.6); review K. Eckstein edits to same (0.3).	4.70	5,734.00
3/3/2023	Rogoff, Adam C.	Review plan presentation for clients (0.2); emails and coordination with J. Shifer re same (0.3); review revised materials (0.3).	0.80	1,332.00
3/3/2023	Shifer, Joseph A.	Revisions to plan presentation (2.2) and emails with A. Rogoff and C. Gange re same (0.5).	2.70	3,456.00
3/3/2023	Gange, Caroline	Further review and edit plan presentation (2.2); correspond w/ J. Shifer re same (0.1).	2.30	2,806.00
3/5/2023	Shifer, Joseph A.	Emails with C. Gange re status of plan.	0.20	256.00
3/6/2023	Rogoff, Adam C.	Emails with K. Eckstein and J. Shifer re plan presentation (0.2); review comments to AHC materials (0.4); emails S Gilbert re same (0.1).	0.70	1,165.50



April 25, 2023  
Invoice #: 879676  
072952-00011  
Page 11

**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/6/2023	Eckstein, Kenneth H.	Call with S. Gilbert and J. Shifer re alternative plan analysis, memo, issues (1.2); follow up with J. Shifer; review and revise memo to clients (1.0); call and correspond with M. Diaz re client report (0.4).	2.60	4,680.00
3/6/2023	Shifer, Joseph A.	Call with K. Eckstein and S. Gilbert re plan presentation (1.2), revisions to same (2.6).	3.80	4,864.00
3/7/2023	Eckstein, Kenneth H.	Review and revise client memo re plan (1.5); call with J. Shifer re same (0.1).	1.60	2,880.00
3/7/2023	Shifer, Joseph A.	Emails with KL team and revisions to alternative plan deck (0.6); revise same (1.6); call with K. Eckstein and C. Gange re same (0.1).	2.30	2,944.00
3/7/2023	Gange, Caroline	Further review and edit plan presentation (0.5); discuss same w/ K. Eckstein and J. Shifer (0.1).	0.60	732.00
3/8/2023	Rogoff, Adam C.	Emails with K. Eckstein and J. Shifer re plan presentation.	0.30	499.50
3/8/2023	Eckstein, Kenneth H.	Review and revise client memo re alternative plans (1.0); c/w J. Shifer and C. Gange re same (0.4); review FTI deck (0.4).	1.80	3,240.00
3/8/2023	Shifer, Joseph A.	Edits to plan presentation (1.1) and confer with K. Eckstein and C. Gange re same (0.4).	1.50	1,920.00



April 25, 2023  
 Invoice #: 879676  
 072952-00011  
 Page 12

**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/8/2023	Gange, Caroline	Multiple edits to plan presentation (1.1) and discuss same w/ K. Eckstein (0.4); discuss same w/ FTI (0.1); review FTI materials re same (0.5).	2.10	2,562.00
3/9/2023	Rogoff, Adam C.	Review plan presentation.	0.20	333.00
3/9/2023	Eckstein, Kenneth H.	Call with J. Shifer to revise memo and emails with J. Shifer and A. Rogoff re same (0.5).	0.50	900.00
3/9/2023	Shifer, Joseph A.	Emails with K. Eckstein, A. Rogoff and C. Gange re plan memo (0.3).	0.30	384.00
3/10/2023	Rogoff, Adam C.	Email K. Eckstein and J. Shifer re plan presentation.	0.20	333.00
3/13/2023	Rogoff, Adam C.	Emails with K. Eckstein and J. Shifer re plan presentation (0.2); review revised deck (0.2).	0.40	666.00
3/13/2023	Shifer, Joseph A.	Emails with K. Eckstein and A. Rogoff re plan memo (0.3), revisions to same (1.8).	2.10	2,688.00
3/14/2023	Eckstein, Kenneth H.	Revise plan presentation (0.4), o/c with J. Shifer re same (0.3).	0.70	1,260.00
3/14/2023	Shifer, Joseph A.	Review and revise presentation (0.9); confer w/ K. Eckstein re same (0.3).	1.20	1,536.00
3/14/2023	Gange, Caroline	Review and edit plan presentation.	1.30	1,586.00
3/15/2023	Rogoff, Adam C.	Email J. Shifer re plan analysis for clients.	0.20	333.00



April 25, 2023  
Invoice #: 879676  
072952-00011  
Page 13

**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
3/15/2023	Eckstein, Kenneth H.	Review FTI letter re PHI, call re same (0.4); review plan power point (1.4).	1.80	3,240.00
3/16/2023	Eckstein, Kenneth H.	Finalize Power Point (0.6), correspond with States re same (0.2), correspond with KL team re plan memo and meeting (0.4).	1.20	2,160.00
3/16/2023	Shifer, Joseph A.	Conf with K. Eckstein re plan deck (0.3), revisions to same (0.8).	1.10	1,408.00
3/16/2023	Gange, Caroline	Review and revise plan presentation (0.9); discuss same w/ K. Eckstein (0.1).	1.00	1,220.00
3/17/2023	Gange, Caroline	Coordinate meeting re plan issues w/ States (0.3); finalize and distribute materials re same (0.6).	0.90	1,098.00
3/22/2023	Shifer, Joseph A.	Emails with C. Gange re status of plan presentation.	0.30	384.00
3/23/2023	Eckstein, Kenneth H.	Prep for Working Group meeting (0.8); calls and correspond re same (0.4).	1.20	2,160.00
3/23/2023	Gange, Caroline	Prep for State meeting re plan issues and review background issues re same.	1.20	1,464.00
<b>TOTAL</b>			<b>56.50</b>	<b>\$79,656.50</b>

Kramer Levin



May 17, 2023

Ad Hoc Committee of Governmental and Other  
Contingent  
Litigation Claimants

Invoice #: 882119  
072952  
Page 1

**FOR PROFESSIONAL SERVICES rendered through April 30, 2023.**

Fees	\$245,907.50
Disbursements and Other Charges	3,114.43
<b>TOTAL BALANCE DUE</b>	<b>\$249,021.93</b>

FEES AND DISBURSEMENTS POSTED AFTER THE BILLING PERIOD SHOWN ON THIS INVOICE WILL APPEAR ON A SUBSEQUENT INVOICE.

DUE AND PAYABLE UPON RECEIPT. THE LEGAL RATE OF INTEREST WILL BE CHARGED FOR BALANCES OUTSTANDING OVER 30 DAYS.

TAX ID # 13-1944339

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May 17, 2023  
Invoice #: 882119  
072952  
Page 2

#### MATTER SUMMARY

**For professional services rendered through April 30, 2023 in connection with the following matters:**

Matter	Matter Name	Fees	Disbs	Total
072952-00001	Asset Analysis and Recovery	\$0.00	\$3,114.43	<b>\$3,114.43</b>
072952-00003	Business Operations	103,368.50	0.00	<b>103,368.50</b>
072952-00004	Case Administration	262.50	0.00	<b>262.50</b>
072952-00006	Employment and Fee Applications	2,273.00	0.00	<b>2,273.00</b>
072952-00008	Litigation	44,444.00	0.00	<b>44,444.00</b>
072952-00009	Meetings and Communications with Ad-Hoc Committee & Creditors	20,082.00	0.00	<b>20,082.00</b>
072952-00011	Plan and Disclosure Statement	75,477.50	0.00	<b>75,477.50</b>
<b>Subtotal</b>		<b>245,907.50</b>	<b>3,114.43</b>	<b>249,021.93</b>
<b>TOTAL CURRENT INVOICE</b>				<b>\$249,021.93</b>



May 17, 2023  
Invoice #: 882119  
072952-00001  
Page 3

**Asset Analysis and Recovery**

**DISBURSEMENTS AND OTHER CHARGES SUMMARY**

DESCRIPTION	AMOUNT
Bloomberg Law Online Research	\$243.27
Data Hosting Charges	2,100.69
Pacer Online Research	123.10
Telecommunication Charges	7.41
Transcript Fees	49.20
Westlaw Online Research	590.76
<b>TOTAL DISBURSEMENTS AND OTHER CHARGES</b>	<b>\$3,114.43</b>



May 17, 2023  
Invoice #: 882119  
072952-00003  
Page 4

**Business Operations**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Bessonette, John	Partner	1.10	\$1,677.50
Blabey, David E.	Partner	0.60	780.00
Caplan, Jonathan S.	Partner	3.70	5,642.50
Eckstein, Kenneth H.	Partner	7.10	12,780.00
Fisher, David J.	Partner	3.30	5,577.00
Holob, Marissa J.	Partner	2.40	3,396.00
Reshtick, Abraham	Partner	5.50	8,250.00
Rosenbaum, Jordan M.	Partner	4.60	6,900.00
Taub, Jeffrey	Spec Counsel	4.10	5,248.00
Zanias, Eleni	Spec Counsel	19.40	24,832.00
Gange, Caroline	Associate	16.90	20,618.00
Khvatskaya, Mariya	Associate	4.10	5,125.00
Warren, Browne	Associate	2.40	2,280.00
Kane, Wendy	Paralegal	0.50	262.50
<b>TOTAL FEES</b>		<b>75.70</b>	<b>\$103,368.50</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/4/2023	Gange, Caroline	Review Avrio bid procedures motion and related documents.	1.20	\$1,464.00



May 17, 2023  
 Invoice #: 882119  
 072952-00003  
 Page 5

**Business Operations**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/5/2023	Rosenbaum, Jordan M.	Review of Avrio sale documents (0.4); calls w/ KL team re same (0.5).	0.90	1,350.00
4/5/2023	Fisher, David J.	Communications with KL team regarding Avrio and next steps (0.5); review APA (0.7).	1.20	2,028.00
4/5/2023	Bessonette, John	Review Avrio 363 sale documents (0.6); emails and calls re same with KL team and FTI re same (0.5).	1.10	1,677.50
4/5/2023	Taub, Jeffrey	Review Avrio APA (0.6), e-mails and calls w/ KL team re same (0.5).	1.10	1,408.00
4/5/2023	Zanias, Eleni	Correspondence with J. Rosenbaum re stalking horse agreement (0.3); review stalking horse agreement and prepare summary of same (5.1); review and provide comment to status email to client (0.4).	5.80	7,424.00
4/7/2023	Rosenbaum, Jordan M.	Review of sale documents (1.7); calls and emails w/ KL team re same (0.5).	2.20	3,300.00
4/7/2023	Zanias, Eleni	Continue to review stalking horse agreement and prepare summary of the same (3.7); correspondence with KL team to discuss review of same (0.6).	4.30	5,504.00
4/7/2023	Khvatkaya, Mariya	Review of Avrio APA.	0.10	125.00
4/7/2023	Gange, Caroline	Review Avrio bid procedures and related documents (1.8); emails w/ KL corporate team re same (0.3); emails w/ DPW re same (0.1).	2.20	2,684.00



May 17, 2023  
Invoice #: 882119  
072952-00003  
Page 6

**Business Operations**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/10/2023	Fisher, David J.	Review Avrio emails regarding status of transactions.	0.80	1,352.00
4/10/2023	Caplan, Jonathan S.	Review inquiry about APA; follow-up w/ KL team re next steps.	0.40	610.00
4/10/2023	Rosenbaum, Jordan M.	Review of Avrio APA.	1.10	1,650.00
4/10/2023	Taub, Jeffrey	Review Avrio APA and KL summary of same (1.0); revise summary of APA (0.8); call and e-mails w/ E. Zanias re same (0.5).	2.30	2,944.00
4/10/2023	Zanias, Eleni	Review J. Taub's revision to APA summary (1.5); call and emails w/ J. Taub re same (0.5).	2.00	2,560.00
4/10/2023	Warren, Browne	Review stalking horse agreement.	2.00	1,900.00
4/10/2023	Khvatkaya, Mariya	Review and summarize APA.	2.70	3,375.00
4/10/2023	Gange, Caroline	Review Avrio sale documents and edit summary re same.	2.80	3,416.00
4/11/2023	Holob, Marissa J.	Review analysis of employee benefit provisions of APA.	0.50	707.50
4/11/2023	Reshtick, Abraham	Commence review of APA and asses tax related items.	2.30	3,450.00
4/11/2023	Caplan, Jonathan S.	Review IP inquiries re APA.	0.60	915.00
4/11/2023	Taub, Jeffrey	Call w/ E. Zanias re PSA summary, e-mail financial advisors re same.	0.50	640.00



May 17, 2023  
 Invoice #: 882119  
 072952-00003  
 Page 7

### **Business Operations**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/11/2023	Zanias, Eleni	Call with J. Taub to review Avrio sale summary (0.3); review comments to purchase agreement received from J. Rosenbaum (0.5); update summary to reflect the same (1.1); follow-up with specialists (0.3).	2.20	2,816.00
4/11/2023	Khvatkaya, Mariya	Review of Avrio APA.	1.00	1,250.00
4/11/2023	Kane, Wendy	Emails w/ C. Gange re data room and review Avrio documents re same.	0.50	262.50
4/13/2023	Rosenbaum, Jordan M.	Review of plan documents.	0.20	300.00
4/13/2023	Caplan, Jonathan S.	Review APA.	0.70	1,067.50
4/13/2023	Fisher, David J.	Review Asset Purchase Agreement (1.1), analysis re same (0.2).	1.30	2,197.00
4/13/2023	Zanias, Eleni	Begin review of schedules and ancillary documents received re Avrio sale (1.3); circulate documents to working group (0.2).	1.50	1,920.00
4/13/2023	Warren, Browne	Review and markup stalking horse agreement.	0.40	380.00
4/13/2023	Gange, Caroline	Review dataroom docs re Avrio sale (1.3); emails w/ KL corporate re same (0.3).	1.60	1,952.00
4/14/2023	Reshtick, Abraham	Continue review and analysis of APA and related materials (2.8); send outline of tax matters and follow up questions to corporate team (0.4).	3.20	4,800.00



May 17, 2023  
 Invoice #: 882119  
 072952-00003  
 Page 8

### **Business Operations**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/14/2023	Gange, Caroline	Review draft Avrio sale summary from E. Zanias and edit same.	2.70	3,294.00
4/14/2023	Khvatskaya, Mariya	Draft summary of APA tax issues.	0.30	375.00
4/17/2023	Rosenbaum, Jordan M.	Call w/ J. Taub and E. Zanias re APA.	0.20	300.00
4/17/2023	Holob, Marissa J.	Review and analyze employee related provisions of APA.	1.90	2,688.50
4/17/2023	Caplan, Jonathan S.	Review Avrio sale documents re IP matters.	1.00	1,525.00
4/17/2023	Taub, Jeffrey	Call w/ J. Rosenbaum and E. Zanias re Avrio purchase agreement summary.	0.20	256.00
4/17/2023	Zanias, Eleni	Review Avrio sale summary inserts received from tax, bankruptcy and employment (0.3); update summary to include same (1.5); continue to review exhibits and schedules to purchase agreement (0.3); call with J. Rosenbaum and J. Taub to discuss status and next steps (0.2).	2.30	2,944.00
4/18/2023	Caplan, Jonathan S.	Review IP issues re Avrio sale.	1.00	1,525.00
4/18/2023	Zanias, Eleni	Review equity commitment letter (0.4); review and respond to questions raised by J. Rosenbaum (0.9).	1.30	1,664.00
4/21/2023	Eckstein, Kenneth H.	Review UCC Avrio statement, comment re same (0.5).	0.50	900.00
4/21/2023	Gange, Caroline	Review UCC Statement re Avrio bid procedures (0.8); email K. Eckstein re same (0.2).	1.00	1,220.00



May 17, 2023  
Invoice #: 882119  
072952-00003  
Page 9

**Business Operations**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/24/2023	Eckstein, Kenneth H.	Review UCC Avrio statement (0.8), correspond with AHC Working Group re same (0.7); review materials and prep for hearing re same (1.0).	2.50	4,500.00
4/24/2023	Gange, Caroline	Review UCC reply to Avrio bid procedures motion (0.3); emails w/ K. Eckstein re same (0.2); prepare and edit talking points re same (3.4).	3.90	4,758.00
4/25/2023	Blabey, David E.	Attend Avrio bidding procedures motion hearing.	0.60	780.00
4/25/2023	Eckstein, Kenneth H.	Correspond with M. Huebner re Avrio hearing (0.4); correspond with A. Preis re Avrio hearing (1.2); prepare talking points for hearing (1.6); emails w/ KL team re same (0.2); attend and appear at Avrio bid procedures hearing (0.7).	4.10	7,380.00
4/25/2023	Gange, Caroline	Update talking points for hearing (0.8); attend hearing re Avrio bid procedures hearing (0.7).	1.50	1,830.00
<b>TOTAL</b>			<b>75.70</b>	<b>\$103,368.50</b>



May 17, 2023  
Invoice #: 882119  
072952-00004  
Page 10

**Case Administration**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Kane, Wendy	Paralegal	0.50	\$262.50
<b>TOTAL FEES</b>		<b>0.50</b>	<b>\$262.50</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/13/2023	Kane, Wendy	Emails w/ C. Gange re data room documents; download same and update internal records.	0.40	\$210.00
4/17/2023	Kane, Wendy	Review Avrio motion and calendar dates re same.	0.10	52.50
<b>TOTAL</b>			<b>0.50</b>	<b>\$262.50</b>



May 17, 2023  
Invoice #: 882119  
072952-00006  
Page 11

#### Employment and Fee Applications

#### PROFESSIONAL SERVICES SUMMARY

TIMEKEEPER	TITLE	HOURS	FEES
Gange, Caroline	Associate	0.40	\$488.00
Kane, Wendy	Paralegal	3.40	1,785.00
<b>TOTAL FEES</b>		<b>3.80</b>	<b>\$2,273.00</b>

#### PROFESSIONAL SERVICES DETAIL

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/5/2023	Kane, Wendy	Prepare KL fee statement for filing and email C. Gange re same (0.1); email other professionals re February fee statements (0.2); file fee statements for Kramer Levin, Houlahan, and Gilbert (0.4); service of same (0.1).	0.80	\$420.00
4/6/2023	Kane, Wendy	Review March fee statement for compliance w/ UST guidelines and local rules.	1.10	577.50
4/14/2023	Kane, Wendy	Further review March fee statement for compliance with UST guidelines and local rules.	0.80	420.00
4/25/2023	Kane, Wendy	Prepare March fee statement and exhibits; email C. Gange re same.	0.50	262.50
4/26/2023	Kane, Wendy	Prepare compiled fee statement and email C. Gange re same.	0.20	105.00
4/27/2023	Gange, Caroline	Finalize fee applications for circulation to clients.	0.40	488.00



May 17, 2023  
Invoice #: 882119  
072952-00006  
Page 12

**Employment and Fee Applications**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
TOTAL			3.80	\$2,273.00



May 17, 2023  
Invoice #: 882119  
072952-00008  
Page 13

**Litigation**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Blabey, David E.	Partner	8.20	\$10,660.00
Caplan, Jonathan S.	Partner	5.00	7,625.00
Eckstein, Kenneth H.	Partner	7.00	12,600.00
Englert, Jr., Roy T.	Partner	2.30	3,795.00
Rosenbaum, Jordan M.	Partner	0.80	1,200.00
Taub, Jeffrey	Spec Counsel	1.00	1,280.00
Gange, Caroline	Associate	2.70	3,294.00
Ortega-Rodriguez, Sealtiel	Associate	4.20	3,990.00
<b>TOTAL FEES</b>		<b>31.20</b>	<b>\$44,444.00</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/12/2023	Caplan, Jonathan S.	Review Accord decision.	0.90	\$1,372.50
4/12/2023	Gange, Caroline	Review Accord litigation decision (1.8); draft memo re same (0.3); emails w/ K. Eckstein and FTI re same (0.3).	2.40	2,928.00
4/13/2023	Caplan, Jonathan S.	Review KL correspondence re Accord decision; follow-up re same.	0.50	762.50



May 17, 2023  
 Invoice #: 882119  
 072952-00008  
 Page 14

### Litigation

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/14/2023	Englert, Jr., Roy T.	Email correspondence w/ KL team re letter to Second Circuit (0.5); review draft of letter (0.4).	0.90	1,485.00
4/14/2023	Blabey, David E.	Emails w/ K: team re letter to Second Circuit.	0.30	390.00
4/17/2023	Eckstein, Kenneth H.	Correspondence w/ KL team re Second Circuit letter (0.4); review letter and revise same (0.8).	1.20	2,160.00
4/18/2023	Englert, Jr., Roy T.	Edit letter to Second Circuit.	0.20	330.00
4/18/2023	Eckstein, Kenneth H.	Review letter to Second Circuit and comment (0.8); call with M. Diaz re Accord and other case issues (0.6).	1.40	2,520.00
4/18/2023	Blabey, David E.	Edit letter to Second Circuit (1.8); email to DPW and Akin re letter to Second Circuit (0.3).	2.10	2,730.00
4/18/2023	Gange, Caroline	Review Second Circuit draft letter.	0.30	366.00
4/19/2023	Blabey, David E.	Emails with Kramer, and DPW and Akin re Second Circuit letter (0.3); edits to letter (0.6); email to Ad Hoc Committee re same (0.6).	1.50	1,950.00
4/19/2023	Caplan, Jonathan S.	Review Accord decision in preparation for Company call.	1.60	2,440.00
4/19/2023	Ortega-Rodriguez, Sealtiel	Reviewing Purdue-Accord decision (1.4), review post-trial briefing (1.2).	2.60	2,470.00
4/20/2023	Rosenbaum, Jordan M.	Attend portion of call w/ Company regarding IP litigation.	0.80	1,200.00



May 17, 2023  
 Invoice #: 882119  
 072952-00008  
 Page 15

### Litigation

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/20/2023	Eckstein, Kenneth H.	Call with company advisors, UCC advisors re Accord patent decision (1.0); review and comment on draft letter to Second Circuit (1.2).	2.20	3,960.00
4/20/2023	Blabey, David E.	Multiple emails and calls with clients, other appellants, and K. Eckstein re Second Circuit letter and edits to same.	2.60	3,380.00
4/20/2023	Caplan, Jonathan S.	Prepare for and attend call w/ Company re Accord decision (1.0), review next steps re same (1.0).	2.00	3,050.00
4/20/2023	Taub, Jeffrey	Attend call w/ Company re Accord litigation.	1.00	1,280.00
4/20/2023	Ortega-Rodriguez, Sealtiel	Review trial history, filings, and notes in preparation for call re: Purdue v. Accord opinion (0.6), attend call w/ Company re same (1.0).	1.60	1,520.00
4/21/2023	Blabey, David E.	Multiple emails and calls with other appellants, K. Eckstein, and MSGE re letter to Second Circuit.	1.20	1,560.00
4/21/2023	Eckstein, Kenneth H.	Review proposed letter to Second Circuit (0.8), correspond w/ KL team re same (0.4), call with M. Huebner re same (0.3).	1.50	2,700.00
4/22/2023	Blabey, David E.	Emails w/ KL team re Second Circuit letter.	0.20	260.00
4/23/2023	Englert, Jr., Roy T.	Emails w/ KL team re letter to Second Circuit.	0.30	495.00
4/23/2023	Blabey, David E.	Emails w/ appellants re finalizing Second Circuit letter.	0.20	260.00



May 17, 2023  
Invoice #: 882119  
072952-00008  
Page 16

**Litigation**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/24/2023	Englert, Jr., Roy T.	Email correspondence about letter to Second Circuit, including outreach to Akin Gump appellate lawyers.	0.50	825.00
4/24/2023	Blabey, David E.	Call with MSGE re Second Circuit letter.	0.10	130.00
4/24/2023	Eckstein, Kenneth H.	Correspond w/ appellants re Second Circuit letter (0.7).	0.70	1,260.00
4/25/2023	Englert, Jr., Roy T.	Email correspondence w/ appellants about letter to Second Circuit.	0.20	330.00
4/26/2023	Englert, Jr., Roy T.	Review final letter as submitted to Second Circuit.	0.20	330.00
<b>TOTAL</b>			<b>31.20</b>	<b>\$44,444.00</b>



May 17, 2023  
Invoice #: 882119  
072952-00009  
Page 17

**Meetings and Communications with Ad-Hoc Committee & Creditors**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Blabey, David E.	Partner	1.60	\$2,080.00
Eckstein, Kenneth H.	Partner	5.20	9,360.00
Ringer, Rachael L.	Partner	2.40	3,396.00
Gange, Caroline	Associate	4.30	5,246.00
<b>TOTAL FEES</b>		<b>13.50</b>	<b>\$20,082.00</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/13/2023	Eckstein, Kenneth H.	Review case issues, prep for client call (1.0); call with States Working Groups re Plan issues (2.0).	3.00	\$5,400.00
4/13/2023	Ringer, Rachael L.	Attend call with States working group re: next steps on plan issues (2.0), follow-up with Eckstein re; same (0.4).	2.40	3,396.00
4/13/2023	Gange, Caroline	Prepare for (0.2) and attend (2.0) meeting with States working group re next steps on plan.	2.20	2,684.00
4/15/2023	Blabey, David E.	Email to working group re letter to Second Circuit.	0.20	260.00
4/18/2023	Eckstein, Kenneth H.	Attend Working Group call re case issues (1.0).	1.00	1,800.00
4/18/2023	Blabey, David E.	Attend portion of working group call (0.8).	0.80	1,040.00



May 17, 2023  
Invoice #: 882119  
072952-00009  
Page 18

**Meetings and Communications with Ad-Hoc Committee & Creditors**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/18/2023	Gange, Caroline	Attend working group call re next steps re plan and States meeting (1.0); draft/edit email to AHC re second circuit letter (0.2).	1.20	1,464.00
4/25/2023	Eckstein, Kenneth H.	Prepare for (0.6) and attend (0.6) Working Group call.	1.20	2,160.00
4/25/2023	Blabey, David E.	Attend working group call (0.6).	0.60	780.00
4/25/2023	Gange, Caroline	Attend working group call re upcoming hearing (0.6); draft client update email re same (0.3).	0.90	1,098.00
<b>TOTAL</b>			<b>13.50</b>	<b>\$20,082.00</b>



May 17, 2023  
Invoice #: 882119  
072952-00011  
Page 19

**Plan and Disclosure Statement**

**PROFESSIONAL SERVICES SUMMARY**

TIMEKEEPER	TITLE	HOURS	FEES
Blabey, David E.	Partner	10.30	\$13,390.00
Eckstein, Kenneth H.	Partner	4.80	8,640.00
Rosenbaum, Jordan M.	Partner	2.20	3,300.00
Gange, Caroline	Associate	36.80	44,896.00
Virmani, Ashish	Associate	2.70	1,944.00
Kane, Wendy	Paralegal	6.30	3,307.50
<b>TOTAL FEES</b>		<b>63.10</b>	<b>\$75,477.50</b>

**PROFESSIONAL SERVICES DETAIL**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/10/2023	Rosenbaum, Jordan M.	Review of plan documents.	1.40	\$2,100.00
4/11/2023	Blabey, David E.	Correspondence with K. Eckstein re next steps on appeals and Plan options.	0.40	520.00
4/11/2023	Gange, Caroline	Review issues re plan and appeals (0.6); draft email to D. Blabey re same (0.5).	1.10	1,342.00
4/12/2023	Eckstein, Kenneth H.	Review issues re plan options (1.3).	1.30	2,340.00
4/12/2023	Blabey, David E.	Review briefs, transcripts, and opinions in appeals for discussion of issues on appeal.	3.30	4,290.00



May 17, 2023  
Invoice #: 882119  
072952-00011  
Page 20

**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/12/2023	Gange, Caroline	Review proposed questions from States in advance of plan options call and draft responses to same (2.9); emails w/ KL team re same (0.3).	3.20	3,904.00
4/13/2023	Blabey, David E.	Prep for call with States and address list of potential questions for call (1.7); call with States re plan issues (2.0).	3.70	4,810.00
4/13/2023	Gange, Caroline	Prep for state meeting (1.1);- review and draft responses to state inquiries re plan issues (1.3).	2.40	2,928.00
4/18/2023	Rosenbaum, Jordan M.	Review of plan documents.	0.40	600.00
4/18/2023	Blabey, David E.	Emails with K. Eckstein re research projects for plan options (0.7).	0.70	910.00
4/19/2023	Gange, Caroline	Discuss next steps re plan options/State call w/ K. Eckstein (0.3); draft agenda re same (0.4); research re same (0.8).	1.50	1,830.00
4/20/2023	Gange, Caroline	Draft talking points for upcoming meeting w/ re plan options (1.5); discuss w/ K. Eckstein and J. Shifer re same (0.4).	1.90	2,318.00
4/24/2023	Blabey, David E.	Multiple emails with C. Gange re research for plan options issues.	0.50	650.00
4/24/2023	Gange, Caroline	Review issues re plan options (0.4); review complaints re same (1.5); edit outline re same (1.2); emails w/ D. Blabey re same (0.3).	3.40	4,148.00



May 17, 2023  
 Invoice #: 882119  
 072952-00011  
 Page 21

**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/24/2023	Kane, Wendy	Review list of pending lawsuits re plan options outline (0.5); email KL team re same (0.1); review MDL lawsuits re same (3.8); email KL team re same (0.1).	4.50	2,362.50
4/25/2023	Rosenbaum, Jordan M.	Review of plan documents.	0.40	600.00
4/25/2023	Blabey, David E.	Review of plan options issues (0.2); emails with A. Virmani and C. Gange re same (1.1).	1.30	1,690.00
4/25/2023	Virmani, Ashish	Research re potential plan options.	1.10	792.00
4/25/2023	Gange, Caroline	Update talking points for upcoming plan options meeting (1.0); emails w/ D. Blabey re research for same and review complaints and related topics (2.2).	3.20	3,904.00
4/26/2023	Gange, Caroline	Correspondence w/ D. Blabey and A. Virmani re plan research progress (0.4); begin research re plan options and related issues (4.9); review underlying complaints re same (1.3); review settlement precedent (0.9).	7.50	9,150.00
4/26/2023	Kane, Wendy	Research re complaints and review dockets for same (1.3); email C. Gange re same (0.1); research re state complaints (0.4).	1.80	945.00
4/27/2023	Eckstein, Kenneth H.	Review non-bankruptcy settlement memo, comment re same (1.4); draft memo to clients re same (0.5).	1.90	3,420.00



May 17, 2023  
Invoice #: 882119  
072952-00011  
Page 22

**Plan and Disclosure Statement**

DATE	TIMEKEEPER	DESCRIPTION	HOURS	AMOUNT
4/27/2023	Virmani, Ashish	Research re potential plan options (0.8); prepare for call with D. Blabey and C. Gange re same and confer with C. Gange re same (0.3).	1.10	792.00
4/27/2023	Gange, Caroline	Research re issues surrounding plan options (5.8); summarize same (0.9); review state legislation re same (1.2); discuss w/ A. Virmani re same (0.1).	8.00	9,760.00
4/28/2023	Blabey, David E.	Call with A. Virmani and C. Gange re plan options research.	0.40	520.00
4/28/2023	Eckstein, Kenneth H.	Correspond re Plan options meeting, call re agenda, review and comment on memo re non-bankruptcy settlements (1.6).	1.60	2,880.00
4/28/2023	Virmani, Ashish	Prepare for (0.1) and call (0.4) w/ D. Blabey and C. Gange re potential plan options.	0.50	360.00
4/28/2023	Gange, Caroline	Research distributor settlements and related issue re plan options for upcoming meeting (3.8); call w/ D. Blabey and A. Virmani re same (0.4); draft talking points re same (0.4).	4.60	5,612.00
<b>TOTAL</b>			<b>63.10</b>	<b>\$75,477.50</b>



May 17, 2023  
Invoice #: 882119  
072952

**REMITTANCE**  
***Payment Due Upon Receipt***

**For Professional Services Rendered Through April 30, 2023:**

Total Current Invoice #882119	\$249,021.93
<b>TOTAL BALANCE DUE</b>	<b>\$249,021.93</b>

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<b>All Checks Should be Payable to:</b>	Kramer Levin Naftalis & Frankel LLP
<b>Mail or Courier Payment to:</b>	Kramer Levin Naftalis & Frankel LLP 1177 Avenue of the Americas New York, NY 10036-2714 Attention: Accounting Department
<b>Wire/ACH Payment to:</b>	Citibank, N.A. 153 E. 53rd Street, 23rd Floor New York, NY 10022 ABA #: 021000089 Swift Code: CITIUS33 Account Name: Kramer Levin Naftalis & Frankel LLP Account AR Acct #: 4979206709 Attn: Karen Robertson, 212.715.7654 Please include invoice number in the wire instructions.

**IMPORTANT**

**A MODIFICATION OF MONEY-TRANSFER OR DISBURSEMENT INSTRUCTIONS IS ONE OF THE RED FLAGS FOR ONLINE BANKING FRAUD. WE STRONGLY ADVISE THAT YOU OBTAIN VERBAL CONFIRMATION OF OUR WIRE OR OTHER DISBURSEMENT INSTRUCTIONS BEFORE INITIATING ANY TRANSFER OF FUNDS TO KRAMER LEVIN.**

**Questions regarding these wire instructions or receipt confirmation should be directed to:**

Karen Robertson/Associate Director, New York Office (212.715.7654)  
Larry Gallo/Controller, New York Office (212.715.7763)  
Margot Usdan, Managing Director, New York Office (212.715.8298)

**PLEASE RETURN THIS REMITTANCE COPY WITH YOUR PAYMENT**

Re: Purdue - Ad Hoc Committee (. Cred. Rgts.)

**Exhibit G**

**Budget and Staffing Plan**

**BUDGET**

**January 1, 2023 – April 30, 2023**

	PROJECT CATEGORY	HOURS BUDGETED	FEES BUDGETED	ACTUAL HOURS BILLED	ACTUAL FEES SOUGHT
00001	Asset Analysis and Recovery	100	\$100,000	0.00	0.00
00003	Business Operations	300	\$300,000	78.50	107,770.50
00004	Case Administration	100	\$100,000	0.80	420.00
00006	Employment and Fee Applications	100	\$100,000	30.00	24,638.00
0007	Emergency Financing			0.00	0.00
00008	Litigation	650	\$650,000	43.10	61,056.00
00009	Meetings and Communications with Ad-Hoc Committee & Creditors	500	\$500,000	49.40	73,693.00
00010	Non-Working Travel	0.00	\$0.00	0.00	0.00
00011	Plan and Disclosure Statement	3000	\$3,000,000	185.60	249,302.50
	<b>TOTAL</b>	<b>5000</b>	<b>\$5,000,000.00</b>	<b>387.40</b>	<b>\$516,880.00</b>

**STAFFING PLAN**

Category of Timekeeper	Range of Hourly Rate
Partner	\$1,300 - \$1,800
Counsel/Special Counsel	\$1,300 - \$1,435
Associate/Law Clerk	\$720 - \$1,280
Paralegal	\$365 - \$555

**EXHIBIT H**

**Blended Hourly Rate Summary**

**CUSTOMARY AND COMPARABLE COMPENSATION  
DISCLOSURES FOR THE ELEVENTH INTERIM FEE PERIOD**

<b>TITLE</b>	<b>Non-Bankruptcy Blended Hourly Rate (\$) – FY22 (New York Office Only)</b>	<b>Committee Blended Hourly Rate in Application (\$)</b>
Partner	1,360	1,634
Counsel	1,275	0
Special Counsel	1,140	1,280
Associate/Law Clerk	928	1,198
Paralegal	427	525
<b>Aggregate Blended Rate</b>	<b>1,042</b>	<b>1,330</b>